

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION  
4

5 -----x  
6 IN RE: NATIONAL PRESCRIPTION ) Case No.  
7 OPIATE LITIGATION ) 1:17-MD-2804  
8 APPLIES TO ALL CASES ) Hon. Dan A. Polster  
9 -----x

10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
11 CONFIDENTIALITY REVIEW  
12

VIDEOTAPED DEPOSITION OF BLAINE M. SNIDER  
13  
14 WASHINGTON, D.C.

15 THURSDAY, NOVEMBER 8, 2018

16 8:34 A.M.  
17  
18  
19  
20  
21  
22  
23

24 Reported by: Leslie A. Todd

1           Deposition of BLAINE M. SNIDER, held at the  
2   offices of:

3

4

5

COVINGTON & BURLING, LLP

6

One City Center

7

850 10th Street, N.W.

8

Washington, DC 20001-4956

9

10

11

12

13

Pursuant to notice, before Leslie Anne Todd,

14

Court Reporter and Notary Public in and for the

15

District of Columbia, who officiated in

16

administering the oath to the witness.

17

18

19

20

21

22

23

24

1 A P P E A R A N C E S

2

3 ON BEHALF OF PLAINTIFFS:

4 BRANDON BOGLE, ESQUIRE

5 WESLEY BOWDEN, ESQUIRE

6 LEVIN PAPANTONIO THOMAS MITCHELL

7 RAFFERTY & PROCTOR, PA

8 316 S. Baylen Street, Suite 600

9 Pensacola, Florida 32502

10 (850) 435-7043

11

12 ON BEHALF OF MCKESSON CORPORATION:

13 KEVIN B. COLLINS, ESQUIRE

14 WEISS NUSRATY, ESQUIRE

15 COVINGTON & BURLING, LLP

16 One CityCenter

17 850 Tenth Street, N.W.

18 Washington, D.C. 20001-4956

19 (202) 662-5598

20

21

22

23

24

1 APPEARANCES (Continued):

2

3 ON BEHALF OF DEFENDANT CVS:

4 DANIEL P. MOYLAN, ESQUIRE

5 ZUCKERMAN SPAEDER, LLP

6 100 East Pratt Street, Suite 2440

7 Baltimore, Maryland 21202-1031

8 (410) 949-1159

9

10 ON BEHALF OF DEFENDANT WALMART:

11 SARAH G. CONWAY, ESQUIRE

12 JONES DAY

13 555 South Flower Street

14 Fiftieth Floor

15 Los Angeles, California 90071-2300

16 (213) 489-3939

17

18 ON BEHALF OF DEFENDANT HBC CO.:

19 SCOTT D. LIVINGSTON, ESQUIRE

20 MARCUS & SHAPIRA, LLP

21 One Oxford Centre, 35th Floor

22 301 Grant Street

23 Pittsburgh, Pennsylvania 15219-6401

24 (412) 338-4690

1 APPEARANCES (Continued):

2 ON BEHALF OF DEFENDANT CARDINAL HEALTH:

3 MIRANDA PETERSEN, ESQUIRE

4 WILLIAMS & CONNOLLY, LLP

5 725 Twelfth Street, N.W.

6 Washington, D.C. 20005

7 (202) 434-5000

8

9 ON BEHALF OF ENDO PHARMACEUTICALS, INC. and

10 ENDO HEALTH SOLUTIONS, INC.:

11 JOHN D. CELLA, ESQUIRE

12 ARNOLD & PORTER KAYE SCHOLER, LLP

13 601 Massachusetts Avenue, N.W.

14 Washington, D.C. 20001-3743

15 (202) 942-6771

16

17 ON BEHALF OF AMERISOURCEBERGEN BERGEN:

18 MOLLY Q. CAMPBELL, ESQUIRE

19 REED SMITH, LLP

20 1301 K Street, N.W.

21 Suite 1000 - East Tower

22 Washington, D.C. 20005

23 (202) 414-9173

24

1 APPEARANCES (Continued):

2

3 ON BEHALF OF ALLERGAN FINANCE:

4 MICHAEL LeFEVOUR, ESQUIRE (Telephonically)

5 KIRKLAND & ELLIS, LLP

6 300 North LaSalle

7 Chicago, Illinois 60654

8 (312) 862-2000

9

10 ON BEHALF OF PRESCRIPTION SUPPLY, INC.:

11 ERIC J. WILLIAMS, ESQUIRE (Telephonically)

12 PELINI, CAMPBELL & WILLIAMS, LLC

13 Bretton Commons - Suite 400

14 8040 Cleveland Avenue NW

15 North Canton, Ohio 44720

16 (330) 305-6400

17

18 ALSO PRESENT:

19 RICHARD WOODS, Paralegal

20 DANIEL HOLMSTOCK, Videographer

21

22

23

24

## 1 C O N T E N T S

2	EXAMINATION OF BLAINE M. SNIDER	PAGE
3	By Mr. Bogle	17, 489
4	By Mr. Collins	453, 514

Reason	Percentage (%)
To have someone to take care of you when you get old	78
To have someone to love and be loved by	92
To have someone to share your life with	85
To have someone to help you with household chores	65
To have someone to play with	72
To have someone to talk to about problems	88
To have someone to spend time with	95
To have someone to look after you if you become disabled	70
To have someone to help you with your education	60
To have someone to share your interests with	82
To have someone to help you with your job	55
To have someone to spend holidays with	75
To have someone to help you with your finances	50
To have someone to play sports with	68
To have someone to help you with your health	62
To have someone to share your secrets with	80
To have someone to help you with your emotions	58
To have someone to spend time with when you are alone	77
To have someone to help you with your career	52
To have someone to share your happiness with	90
To have someone to help you with your loneliness	67
To have someone to play games with	73
To have someone to help you with your stress	63
To have someone to share your dreams with	87
To have someone to help you with your fears	57
To have someone to spend time with when you are sad	76
To have someone to help you with your self-esteem	53
To have someone to share your laughter with	91
To have someone to help you with your anger	61
To have someone to play music with	69
To have someone to help you with your confidence	59
To have someone to share your thoughts with	84
To have someone to help you with your motivation	54
To have someone to spend time with when you are bored	74
To have someone to help you with your discipline	51
To have someone to share your creativity with	86
To have someone to help you with your focus	56
To have someone to spend time with when you are tired	71
To have someone to help you with your organization	50
To have someone to share your passion with	89
To have someone to help you with your productivity	55
To have someone to play art with	66
To have someone to help you with your communication skills	58
To have someone to share your knowledge with	83
To have someone to help you with your problem-solving abilities	52
To have someone to spend time with when you are overwhelmed	72
To have someone to help you with your decision-making	50
To have someone to share your wisdom with	88
To have someone to help you with your emotional stability	57
To have someone to play dance with	64
To have someone to help you with your social skills	53
To have someone to share your experiences with	81
To have someone to help you with your personal growth	51
To have someone to spend time with when you are lonely	75
To have someone to help you with your self-awareness	50
To have someone to share your joy with	93
To have someone to help you with your resilience	59
To have someone to play chess with	67
To have someone to help you with your adaptability	56
To have someone to share your humor with	85
To have someone to help you with your perseverance	54
To have someone to spend time with when you are stressed	73
To have someone to help you with your patience	52
To have someone to share your kindness with	90
To have someone to help you with your empathy	58
To have someone to play board games with	65
To have someone to help you with your compassion	55
To have someone to share your generosity with	87
To have someone to help you with your forgiveness	53
To have someone to spend time with when you are anxious	71
To have someone to help you with your calmness	50
To have someone to share your peace with	89
To have someone to help you with your balance	57
To have someone to play cards with	63
To have someone to help you with your harmony	54
To have someone to share your love with	94
To have someone to help you with your understanding	59
To have someone to play video games with	68
To have someone to help you with your acceptance	56
To have someone to share your gratitude with	86
To have someone to help you with your optimism	52
To have someone to spend time with when you are depressed	74
To have someone to help you with your positivity	50
To have someone to share your hope with	91
To have someone to help you with your faithfulness	58
To have someone to play puzzles with	66
To have someone to help you with your loyalty	55
To have someone to share your honesty with	88
To have someone to help you with your integrity	53
To have someone to spend time with when you are confused	72
To have someone to help you with your clarity	50
To have someone to share your truth with	92
To have someone to help you with your justice	57
To have someone to play strategy games with	64
To have someone to help you with your fairness	54
To have someone to share your courage with	85
To have someone to help you with your bravery	52
To have someone to spend time with when you are nervous	73
To have someone to help you with your confidence	50
To have someone to share your strength with	90
To have someone to help you with your determination	58
To have someone to play role-playing games with	67
To have someone to help you with your commitment	56
To have someone to share your respect with	87
To have someone to help you with your responsibility	53
To have someone to spend time with when you are shy	71
To have someone to help you with your assertiveness	50
To have someone to share your leadership with	89
To have someone to help you with your teamwork	57
To have someone to play simulation games with	63
To have someone to help you with your collaboration	54
To have someone to share your ambition with	86
To have someone to help you with your achievement	52
To have someone to spend time with when you are insecure	74
To have someone to help you with your self-love	50
To have someone to share your pride with	91
To have someone to help you with your humility	58
To have someone to play trivia games with	65
To have someone to help you with your modesty	55
To have someone to share your grace with	88
To have someone to help you with your dignity	53
To have someone to spend time with when you are embarrassed	72
To have someone to help you with your composure	50
To have someone to share your elegance with	92
To have someone to help you with your poise	57
To have someone to play word games with	64
To have someone to help you with your charm	54
To have someone to share your wit with	85
To have someone to help you with your allure	52
To have someone to spend time with when you are awkward	73
To have someone to help you with your sophistication	50
To have someone to share your refinement with	90
To have someone to help you with your classiness	58
To have someone to play logic games with	67
To have someone to help you with your intellect	56
To have someone to share your genius with	87
To have someone to help you with your brilliance	53
To have someone to spend time with when you are clumsy	71
To have someone	

Category	Sub-category	Value
A	1	10
	2	20
B	1	30
	2	40
C	1	50
	2	60
D	1	70
	2	80
E	1	90
	2	100
F	1	110
	2	120
G	1	130
	2	140
H	1	150
	2	160
I	1	170
	2	180
J	1	190
	2	200
K	1	210
	2	220
L	1	230
	2	240
M	1	250
	2	260
N	1	270
	2	280
O	1	290
	2	300
P	1	310
	2	320
Q	1	330
	2	340
R	1	350
	2	360
S	1	370
	2	380
T	1	390
	2	400
U	1	410
	2	420
V	1	430
	2	440
W	1	450
	2	460
X	1	470
	2	480
Y	1	490
	2	500
Z	1	510
	2	520

22

23

24



■		[REDACTED]	[REDACTED]	
■		[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		
■		[REDACTED]		
■		[REDACTED]		
■		[REDACTED]		
■		[REDACTED]		
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		[REDACTED]
■	[REDACTED]	[REDACTED]		
■		[REDACTED]		[REDACTED]

[illegible]

1		100%	100%
2		100%	100%
3	100%	100%	100%
4	100%	100%	100%
5		100%	100%
6		100%	100%
7		100%	100%
8	100%	100%	100%
9	100%	100%	100%
10		100%	100%
11		100%	100%
12	100%	100%	100%
13		100%	100%
14	100%	100%	100%
15		100%	100%
16	100%	100%	100%
17		100%	100%
18	100%	100%	100%
19		100%	100%
20	100%	100%	100%
21		100%	100%
22	100%	100%	100%
23		100%	100%
24	100%	100%	100%
25		100%	100%
26	100%	100%	100%
27		100%	100%
28	100%	100%	100%
29		100%	100%
30	100%	100%	100%
31		100%	100%
32	100%	100%	100%
33		100%	100%
34	100%	100%	100%
35		100%	100%
36	100%	100%	100%
37		100%	100%
38	100%	100%	100%
39		100%	100%
40	100%	100%	100%
41		100%	100%
42	100%	100%	100%
43		100%	100%
44	100%	100%	100%
45		100%	100%
46	100%	100%	100%
47		100%	100%
48	100%	100%	100%
49		100%	100%
50	100%	100%	100%
51		100%	100%
52	100%	100%	100%
53		100%	100%
54	100%	100%	100%
55		100%	100%
56	100%	100%	100%
57		100%	100%
58	100%	100%	100%
59		100%	100%
60	100%	100%	100%
61		100%	100%
62	100%	100%	100%
63		100%	100%
64	100%	100%	100%
65		100%	100%
66	100%	100%	100%
67		100%	100%
68	100%	100%	100%
69		100%	100%
70	100%	100%	100%
71		100%	100%
72	100%	100%	100%
73		100%	100%
74	100%	100%	100%
75		100%	100%
76	100%	100%	100%
77		100%	100%
78	100%	100%	100%
79		100%	100%
80	100%	100%	100%
81		100%	100%
82	100%	100%	100%
83		100%	100%
84	100%	100%	100%
85		100%	100%
86	100%	100%	100%
87		100%	100%
88	100%	100%	100%
89		100%	100%
90	100%	100%	100%
91		100%	100%
92	100%	100%	100%
93		100%	100%
94	100%	100%	100%
95		100%	100%
96	100%	100%	100%
97		100%	100%
98	100%	100%	100%
99		100%	100%
100	100%	100%	100%

[illegible]

23

24

1		100%	100%
2		100%	100%
3	100%	100%	100%
4	100%	100%	100%
5		100%	100%
6		100%	100%
7		100%	100%
8		100%	100%
9		100%	100%
10	100%	100%	100%
11		100%	100%
12	100%	100%	100%
13		100%	100%
14	100%	100%	100%
15		100%	100%
16	100%	100%	100%
17		100%	100%
18	100%	100%	100%
19		100%	100%
20	100%	100%	100%
21		100%	100%
22	100%	100%	100%
23		100%	100%
24	100%	100%	100%
25		100%	100%
26	100%	100%	100%
27		100%	100%
28	100%	100%	100%
29		100%	100%
30	100%	100%	100%
31		100%	100%
32	100%	100%	100%
33		100%	100%
34	100%	100%	100%
35		100%	100%
36	100%	100%	100%
37		100%	100%
38	100%	100%	100%
39		100%	100%
40	100%	100%	100%
41		100%	100%
42	100%	100%	100%
43		100%	100%
44	100%	100%	100%
45		100%	100%
46	100%	100%	100%
47		100%	100%
48	100%	100%	100%
49		100%	100%
50	100%	100%	100%
51		100%	100%
52	100%	100%	100%
53		100%	100%
54	100%	100%	100%
55		100%	100%
56	100%	100%	100%
57		100%	100%
58	100%	100%	100%
59		100%	100%
60	100%	100%	100%
61		100%	100%
62	100%	100%	100%
63		100%	100%
64	100%	100%	100%
65		100%	100%
66	100%	100%	100%
67		100%	100%
68	100%	100%	100%
69		100%	100%
70	100%	100%	100%
71		100%	100%
72	100%	100%	100%
73		100%	100%
74	100%	100%	100%
75		100%	100%
76	100%	100%	100%
77		100%	100%
78	100%	100%	100%
79		100%	100%
80	100%	100%	100%
81		100%	100%
82	100%	100%	100%
83		100%	100%
84	100%	100%	100%
85		100%	100%
86	100%	100%	100%
87		100%	100%
88	100%	100%	100%
89		100%	100%
90	100%	100%	100%
91		100%	100%
92	100%	100%	100%
93		100%	100%
94	100%	100%	100%
95		100%	100%
96	100%	100%	100%
97		100%	100%
98	100%	100%	100%
99		100%	100%
100	100%	100%	100%

1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			
33			
34			
35			
36			
37			
38			
39			
40			
41			
42			
43			
44			
45			
46			
47			
48			
49			
50			
51			
52			
53			
54			
55			
56			
57			
58			
59			
60			
61			
62			
63			
64			
65			
66			
67			
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			
78			
79			
80			
81			
82			
83			
84			
85			
86			
87			
88			
89			
90			
91			
92			
93			
94			
95			
96			
97			
98			
99			
100			

[illegible]

9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			



1 P R O C E E D I N G S

2 -----

3 THE VIDEOGRAPHER: We are now on the  
4 record. My name is Daniel Holmstock. I am the  
5 videographer for Golkow Litigation Services.  
6 Today's date is November 8, 2018, and the time on  
7 the screen is 8:34 a.m.

8 This deposition is being held at the law  
9 offices of Covington & Burling, LLP, at 850  
10 10th Street, Northwest, in Washington, D.C., in  
11 the matter of In Re: National Prescription Opiate  
12 Litigation. It is pending before the United  
13 States District Court for the Northern District of  
14 Ohio, Eastern Division.

15 The deponent today is Mr. Blaine Snider.  
16 Counsel will be noted on the  
17 stenographic record. The court reporter is Leslie  
18 Todd, who will now administer the oath.

19 BLAINE M. SNIDER,  
20 and having been first duly sworn,  
21 was examined and testified as follows:

22 CROSS EXAMINATION

23 BY MR. BOGLE:

24 Q Can I get your full name, sir?

1           A       Blaine Matthew Snider.

2           Q       And am I correct that you're currently  
3   employed with McKesson?

4           A       Yes.

5           Q       Okay. And have you ever been deposed  
6   before?

7           A       No.

8           Q       Okay. Just a few basic ground rules  
9   that might help both of us here today. I'm going  
10   to be asking you some questions, and if you don't  
11   understand the question I ask or don't hear it,  
12   it's perfectly okay for you to ask me to repeat or  
13   rephrase the question. Okay?

14          A       Okay.

15          Q       If you need a break at any point in  
16   time, just let me know or your counsel know.  
17   Happy to take a break whenever you need it. All  
18   I'd ask is if I've got a question pending, that  
19   you answer that question, and then we can break  
20   for whenever you want.

21                   And also I'm going to ask you questions,  
22   you're going to provide answers. I'd ask that we  
23   try not to talk over each other. So I'll ask my  
24   question, try to give you ample opportunity to

1 answer before I ask my next question. Is that  
2 fair?

3 A Okay.

4 Q Okay. And how long have you been with  
5 McKesson?

6 A Almost 40 years.

7 Q Okay. Am I correct that you currently  
8 hold the director of operations position at the  
9 New Castle Distribution Center?

10 A Yes.

11 Q Okay. How long have you held that  
12 specific position?

13 A Eighteen -- eighteen years.

14 Q Okay. What was your job at McKesson  
15 prior to that?

16 A I was distribution center manager in  
17 Sewickley, Pennsylvania, and North Canton, Ohio.

18 Q Okay. How long did you have that role?

19 A About three years.

20 Q How about prior to that?

21 A I was operations manager in Cincinnati,  
22 Ohio, and North Canton previous to that.

23 Q How long did you hold that position?

24 A Oh, I can't remember now. Eight, ten

1     years, I guess.

2             Q     Okay. What was your job prior to that  
3     at McKesson, just the title?

4             A     I started as a supervisor almost 40  
5     years ago.

6             Q     Okay. So would it be fair to say, just  
7     doing the rough math here, that you have nearly 30  
8     years of experience as a distribution center  
9     operations manager at McKesson?

10            A     Yes.

11            Q     Okay. Now, McKesson itself as an entity  
12     has, as I understand it, 37 distribution centers  
13     around the country; is that right?

14                   MR. COLLINS: Objection to the form.

15                   THE WITNESS: I can't answer to -- it  
16     sounds like you're including med-surg or something  
17     else. I know there's 28 distributions centers for  
18     U.S. pharma.

19     BY MR. BOGLE:

20            Q     Okay. And New Castle is one of those 28  
21     distribution centers for U.S. pharma, correct?

22            A     Yes.

23            Q     And just so I understand, as director of  
24     operations for New Castle, it would be your

1     general responsibility to run the day-to-day  
2     operations for the facility, correct?

3                   MR. COLLINS:   Objection.   Form.

4                   THE WITNESS:   I'm in charge of the  
5     facility, yes.

6     BY MR. BOGLE:

7           Q     Right.   So it's fair to say that you're  
8     the highest ranking McKesson employee at New  
9     Castle that has responsibility exclusive to that  
10    distribution center, right?

11                  MR. COLLINS:   Objection to form.

12                  THE WITNESS:   Well, I'm not sure.   I  
13    have a VP/GM I report to, but I run the  
14    distribution center.

15    BY MR. BOGLE:

16           Q     Who do you report to?

17           A     Brian Ferreira, the VP/GM.

18           Q     When it comes to decisions specific to  
19    the operations of New Castle, would it be fair to  
20    say that the buck stops with you?

21                  MR. COLLINS:   Objection to form, vague.

22                  THE WITNESS:   I don't think so.

23    BY MR. BOGLE:

24           Q     Okay.   Who do you think the buck stops

1 with at New Castle?

2 MR. COLLINS: Same objection.

3 THE WITNESS: I don't know the buck. I  
4 know I'm in charge of the distribution center  
5 operations, and I have a boss who is the VP/GM.

6 BY MR. BOGLE:

7 Q Okay. When you say you're responsible  
8 for distribution center operations, what do you  
9 think that that -- that entails?

10 A In charge of the distribution center and  
11 the employees, and the pick, pack and ship of that  
12 operations.

13 Q When you say "pick, pack and ship," what  
14 does that mean?

15 A The day-to-day filling of orders for our  
16 customers out of the New Castle DC.

17 Q Okay. And when it comes to pills that  
18 are distributed from New Castle, you would agree  
19 with me that it's your ultimate responsibility to  
20 make sure that those go to the proper customers  
21 for the proper purpose.

22 MR. COLLINS: Objection. Compound,  
23 form.

24 THE WITNESS: We make sure the orders

1 are correct, accurate, billed correctly, shipped  
2 correctly, on time.

3 BY MR. BOGLE:

4 Q And your job responsibilities also  
5 include, when it comes to controlled substances,  
6 making sure that the customers purchasing are  
7 purchasing for a legitimate medical purpose,  
8 correct?

9 MR. COLLINS: Objection. Form, calls  
10 for a legal conclusion, lacks foundation.

11 THE WITNESS: I can't say for the  
12 customers all the time. I can say that I follow  
13 the Code of Federal Regulations.

14 BY MR. BOGLE:

15 Q Okay. And part of the Code of Federal  
16 Regulations, when it comes to the Controlled  
17 Substances Act, talks about the distributor's  
18 responsibility to ensure that they're supplying  
19 drugs to customers who are buying it for a  
20 legitimate medical purpose, right?

21 MR. COLLINS: Objection. Form, asked  
22 and answered --

23 THE WITNESS: Can you repeat that?

24 MR. COLLINS: -- calls for a legal

1 conclusion.

2 Please let me finish my objections.

3 BY MR. BOGLE:

4 Q When it comes to the Controlled  
5 Substances Act, you understand that part of that  
6 act requires that controlled substances that are  
7 distributed to customers are being provided for a  
8 legitimate medical purpose, correct?

9 MR. COLLINS: Objection. Form, calls  
10 for a legal conclusion.

11 THE WITNESS: I can't --

12 MR. COLLINS: Foundation.

13 THE WITNESS: I can't say a legitimate  
14 medical purpose. I don't know that phrase. I'm  
15 sorry.

16 BY MR. BOGLE:

17 Q You've never heard that phrase?

18 A No.

19 Q Okay. You're a member of management at  
20 the distribution center for New Castle, right?

21 A Yes.

22 MR. COLLINS: Objection to form.

23 BY MR. BOGLE:

24 Q And the distribution center management



1 at McKesson has the full responsibility for  
2 ensuring the proper distribution of controlled  
3 substances, correct?

4 MR. COLLINS: Objection to form, calls  
5 for a legal conclusion, vague.

6 THE WITNESS: Can you repeat the  
7 question, please?

8 MR. BOGLE: Can you repeat back, Court  
9 Reporter?

10 (Whereupon, the requested record  
11 was read.)

12 MR. COLLINS: Same objections.

13 THE WITNESS: I believe so, yes.

14 BY MR. BOGLE:

15 Q Okay. And that's a job you take  
16 seriously, right?

17 A Yes.

18 Q Okay. Just make sure you speak up a  
19 little bit. I'm having sometimes a little trouble  
20 hearing you.

21 A Okay.

22 Q Is that "yes"?

23 A Yes.

■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■		[REDACTED]	■
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	■	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■	[REDACTED]		

[REDACTED]

15 BY MR. BOGLE:

16 Q You would agree with me that protecting  
17 the health and safety of the public is the most  
18 important consideration for any distributor of  
19 pharmaceutical products, correct?

20 MR. COLLINS: Objection. Form,  
21 foundation, calls for a legal conclusion, argue --

22 MR. BOGLE: I believe you're supposed to  
23 just --

24 MR. COLLINS: Argumentative.

1 MR. BOGLE: -- stick to form objections.  
2 You're going beyond that considerably here.

3 MR. COLLINS: No, my objection is  
4 legitimate. Your question wasn't. So my  
5 objection stands. It's the form, calls for a  
6 legal conclusion --

7 MR. BOGLE: I believe the protocol calls  
8 for just form objections. Not speaking objections  
9 beyond that.

10 MR. COLLINS: We have a phone here if  
11 you want to make a call to the special master.

12 MR. BOGLE: Well, we can see if this  
13 continues. We may have to.

14 MR. COLLINS: Listen, it's a proper  
15 objection. Your question wasn't.

16 MR. BOGLE: I don't want to stop ten  
17 minutes in.

18 BY MR. BOGLE:

19 Q I'll ask my question again.

20 Do you believe that protecting the  
21 health and safety of the public is the most  
22 important consideration for a distributor of  
23 pharmaceutical products?

24 MR. COLLINS: Same objections. Form,

1 calls for a legal conclusion, foundation.

2 THE WITNESS: I can't answer to all the  
3 health and safety of the public. I can answer to  
4 the Code of Federal Regulations and my duties.

5 BY MR. BOGLE:

6 Q Okay. So do you believe that compliance  
7 with the Federal Regulations is the most important  
8 consideration for a distributor of pharmaceutical  
9 products like McKesson?

10 MR. COLLINS: Objection to form.

11 THE WITNESS: I think it's a part of it.

12 BY MR. BOGLE:

13 Q Okay. Any more important part that you  
14 can think of?

15 MR. COLLINS: Same objections. Form,  
16 foundation.

17 THE WITNESS: Well, people.

18 BY MR. BOGLE:

19 Q People, what do you mean by that?

20 A My employees.

21 Q Okay. What about the people that you're  
22 supplying the controlled substances to ultimately,  
23 the end user?

24 MR. COLLINS: Object --

1 BY MR. BOGLE:

2 Q Do you think you have any responsibility  
3 to those people?

4 MR. COLLINS: Objection. It's a  
5 mischaracterization, lacks foundation, form.

6 THE WITNESS: I mentioned before about  
7 on-time, accurate delivery to my customers.

8 BY MR. BOGLE:

9 Q Okay. So you think you have any  
10 responsibility to the -- the end user, the person  
11 who's purchasing from your customer?

12 MR. COLLINS: Objection to form, calls  
13 for speculation.

14 THE WITNESS: I think I mentioned that  
15 before. Yes.

16 BY MR. BOGLE:

17 Q Okay. And as to the ultimate purchaser,  
18 the person who's going to go to your -- to the  
19 pharmacy and purchase the drug, do you think that  
20 McKesson has a responsibility to protect the  
21 health and safety of those people?

22 MR. COLLINS: Same objections. Asked  
23 and answered, form.

24 THE WITNESS: I can't answer for all of

1 McKesson. I can just answer for New Castle.

2 BY MR. BOGLE:

3 Q Sure. Then I'll rephrase it that way.

4 Do you think New Castle has such a responsibility?

5 MR. COLLINS: Same objections.

6 THE WITNESS: I don't -- can you repeat

7 the question?

8 BY MR. BOGLE:

9 Q Sure.

10 Do you think New Castle has a  
11 responsibility for the health and safety of the  
12 end user purchasing controlled substances  
13 distributed by McKesson?

14 MR. COLLINS: Objection to form.

15 THE WITNESS: I can't say that I can  
16 control that.

17 BY MR. BOGLE:

18 Q Okay. I didn't ask if control. I asked  
19 if you had responsibility.

20 MR. COLLINS: Objection to form.

21 THE WITNESS: I can't be responsible for  
22 someone that purchases drugs.

23 BY MR. BOGLE:

24 Q Okay. So you think you have no

1 responsibility for ensuring that people are  
2 purchasing for legitimate medical purposes?

3 MR. COLLINS: Objection to form,  
4 argumentative. Calls for a legal conclusion.

5 THE WITNESS: I can't answer to that.

6 BY MR. BOGLE:

7 Q You don't know?

8 A I can't answer to that.

9 Q Okay. When you say you can't answer  
10 that, what -- what's keeping you from answering  
11 that?

12 A I don't know.

13 Q Okay. Have you heard of the term  
14 "diversion" when it comes to controlled  
15 substances?

16 A Yes.

17 Q What does that term mean to you?

18 A It's in the supply chain where the  
19 product could be diverted. Like inbound trucks  
20 that come in, sometimes those are hijacked, or in  
21 the building to make sure security is there.  
22 There's a chance for diversion there. And in the  
23 truck drivers, there's a chance for diversion  
24 there. And to make sure that that supply chain is



1 intact.

2 Q Okay. So you talked about ways that  
3 diversion can occur, but before we get there, what  
4 do you understand the term "diversion" to mean?  
5 When somebody diverts something when it comes to  
6 controlled substances, what does that mean to you?

7 A Loss of controlled substance.

8 Q Loss of product?

9 A Yes.

10 Q Okay. Have you ever heard the term  
11 "diversion" used to mean the use of a controlled  
12 substance for an illegitimate purpose?

13 A No.

14 Q Never heard of that concept?

15 A No.

16 Q Okay. You've talked a couple of times  
17 about compliance with Federal Regulations, and  
18 that you're familiar with the Controlled  
19 Substances Act, correct?

20 MR. COLLINS: Objection. Lacks  
21 foundation, calls for a legal conclusion.

22 THE WITNESS: Is that the Code of  
23 Federal Regulations?

24 BY MR. BOGLE:

1           Q     I'm just asking if you're familiar with  
2     the Controlled Substances Act.

3           A     I'm not sure.

4           Q     You're not -- have you ever heard that  
5     phrase used, Controlled Substances Act?

6           A     No.

7           Q     Never heard that?

8           A     No.

9           Q     Okay. So is that -- have you ever read  
10    any portion of that act in conjunction with your  
11    responsibilities at McKesson?

12          A     I would have to see it. I'm not sure it  
13    was called the Controlled Substance Act. I just  
14    know the Code of Federal Regulations.

15          Q     Okay. Do you have any familiarity as to  
16    whether the Controlled Substances Act was -- was  
17    and is designed to prevent diversion of controlled  
18    substances like opioids?

19               MR. COLLINS: Objection. Calls for a  
20    legal conclusion, form.

21               THE WITNESS: I can't answer to that. I  
22    don't know.

23    BY MR. BOGLE:

24          Q     Are you familiar with SOP 55? Ever

1 heard of that?

2 A No.

3 Q Okay. And SOP, I'm referring to  
4 Standard Operating Procedure, 55. Does that help  
5 at all?

6 A I don't call it that.

7 Q Okay.

8 A I'm not familiar with that.

9 Q Okay. I'm going to hand you what I'm  
10 marking as -- it's labeled as Exhibit 1.1555,  
11 being marked as Snider Exhibit 1.

12 (Snider Exhibit No. 1 was marked  
13 for identification.)

14 MR. BOGLE: There's yours, and there's  
15 an extra there too.

16 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

Category	Percentage
1. Very high	95%
2. High	85%
3. Medium	55%
4. Low	25%
5. Very low	15%
6. Not at all	10%
7. Don't know	85%
8. No answer	15%
9. No opinion	15%
10. No response	15%
11. No data	15%
12. No information	15%
13. No access	15%
14. No contact	15%
15. No communication	15%
16. No interaction	15%
17. No participation	15%
18. No involvement	15%
19. No contribution	15%
20. No input	15%
21. No output	15%
22. No result	15%
23. No achievement	15%
24. No success	15%
25. No failure	15%
26. No loss	15%
27. No gain	15%
28. No benefit	15%
29. No harm	15%
30. No effect	15%
31. No impact	15%
32. No change	15%
33. No movement	15%
34. No action	15%
35. No decision	15%
36. No choice	15%
37. No option	15%
38. No possibility	15%
39. No chance	15%
40. No risk	15%
41. No danger	15%
42. No threat	15%
43. No danger	15%
44. No threat	15%
45. No danger	15%
46. No threat	15%
47. No danger	15%
48. No threat	15%
49. No danger	15%
50. No threat	15%

[illegible]



[illegible]



[illegible]

[illegible]

[illegible]

1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
37	38	39
40	41	42
43	44	45
46	47	48
49	50	51
52	53	54
55	56	57
58	59	60
61	62	63
64	65	66
67	68	69
70	71	72
73	74	75
76	77	78
79	80	81
82	83	84
85	86	87
88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

[illegible]

[illegible]

[illegible]





[illegible]



A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The bars are gray, and the background is white. The chart is enclosed in a black border.

Category	Percentage
1	85%
2	55%
3	85%
4	75%
5	75%
6	100%
7	45%
8	85%
9	90%
10	45%
11	55%
12	100%
13	90%
14	60%
15	30%
16	90%
17	85%
18	25%
19	100%
20	85%
21	85%
22	85%
23	45%
24	85%

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not at all	100%
7. Don't know	100%
8. No answer	100%
9. No opinion	100%
10. No response	100%
11. No comment	100%
12. No information	100%
13. No data	100%
14. No results	100%
15. No findings	100%
16. No conclusions	100%
17. No recommendations	100%
18. No suggestions	100%
19. No advice	100%
20. No help	100%
21. No support	100%
22. No assistance	100%
23. No aid	100%
24. No relief	100%
25. No comfort	100%
26. No consolation	100%
27. No encouragement	100%
28. No motivation	100%
29. No inspiration	100%
30. No guidance	100%
31. No direction	100%
32. No guidance	100%
33. No direction	100%
34. No guidance	100%
35. No direction	100%
36. No guidance	100%
37. No direction	100%
38. No guidance	100%
39. No direction	100%
40. No guidance	100%
41. No direction	100%
42. No guidance	100%
43. No direction	100%
44. No guidance	100%
45. No direction	100%
46. No guidance	100%
47. No direction	100%
48. No guidance	100%
49. No direction	100%
50. No guidance	100%
51. No direction	100%
52. No guidance	100%
53. No direction	100%
54. No guidance	100%
55. No direction	100%
56. No guidance	100%
57. No direction	100%
58. No guidance	100%
59. No direction	100%
60. No guidance	100%
61. No direction	100%
62. No guidance	100%
63. No direction	100%
64. No guidance	100%
65. No direction	100%
66. No guidance	100%
67. No direction	100%
68. No guidance	100%
69. No direction	100%
70. No guidance	100%
71. No direction	100%
72. No guidance	100%
73. No direction	100%
74. No guidance	100%
75. No direction	100%
76. No guidance	100%
77. No direction	100%
78. No guidance	100%
79. No direction	100%
80. No guidance	100%
81. No direction	100%
82. No guidance	100%
83. No direction	100%
84. No guidance	100%
85. No direction	100%
86. No guidance	100%
87. No direction	100%
88. No guidance	100%
89. No direction	100%
90. No guidance	100%
91. No direction	100%
92. No guidance	100%
93. No direction	100%
94. No guidance	100%
95. No direction	100%
96. No guidance	100%
97. No direction	100%
98. No guidance	100%
99. No direction	100%
100. No guidance	100%



[illegible]

Category	Percentage
1	95%
2	90%
3	15%
4	5%
5	5%
6	95%
7	55%
8	5%
9	5%
10	90%
11	95%
12	95%
13	85%
14	25%
15	15%
16	15%
17	15%
18	95%
19	55%
20	25%
21	5%
22	95%
23	15%
24	5%
25	5%
26	95%
27	95%
28	95%
29	95%
30	95%
31	95%
32	95%
33	95%
34	95%
35	95%
36	95%
37	95%
38	95%
39	95%
40	95%
41	95%
42	95%
43	95%
44	95%
45	95%
46	95%
47	95%
48	95%
49	95%
50	95%
51	95%
52	95%
53	95%
54	95%
55	95%
56	95%
57	95%
58	95%
59	95%
60	95%
61	95%
62	95%
63	95%
64	95%
65	95%
66	95%
67	95%
68	95%
69	95%
70	95%
71	95%
72	95%
73	95%
74	95%
75	95%
76	95%
77	95%
78	95%
79	95%
80	95%
81	95%
82	95%
83	95%
84	95%
85	95%
86	95%
87	95%
88	95%
89	95%
90	95%
91	95%
92	95%
93	95%
94	95%
95	95%
96	95%
97	95%
98	95%
99	95%
100	95%

[illegible]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 BY MR. BOGLE:

14 Q Okay. So would you agree that if New  
15 Castle complies with the Controlled Substances  
16 Act, that goes a long way in preventing diversion  
17 of opioids, right?

18 MR. COLLINS: Objection to the form,  
19 vague, calls for a legal conclusion.

20 THE WITNESS: I think it helps.

21 BY MR. BOGLE:

22 Q Do you agree there is currently an  
23 opioid epidemic in this country?

24 A Yes.

1 Q And do you agree that the diversion of  
2 controlled substances is a cause of that epidemic?

3 MR. COLLINS: Objection. Calls for a  
4 legal conclusion. Foundation.

5 THE WITNESS: You keep using the word  
6 "diversion." In the control of McKesson New  
7 Castle, I believe if there were diversion, that  
8 would not help the opioid crisis.

9 BY MR. BOGLE:

10 Q All right. And the opioid crisis that  
11 we are dealing with today, do you understand was  
12 caused, in part, by diversion of controlled  
13 substances?

14 MR. COLLINS: Objection. Form, calls  
15 for a legal conclusion, lack of foundation.

16 THE WITNESS: I don't know that.

17 BY MR. BOGLE:

18 Q You don't know.

19 Are you aware that opioid overdoses are  
20 the leading cause of injury-related death in the  
21 United States?

22 MR. COLLINS: Objection. Form.

23 THE WITNESS: No, I'm not.

24 BY MR. BOGLE:

1           Q     Okay. I'm going to hand you what I'm  
2     marking as Exhibit 1.264, also marked as Snider  
3     Exhibit 2.

4                     (Snider Exhibit No. 2 was marked  
5                     for identification.)

6           MR. COLLINS: Thank you.

7     BY MR. BOGLE:

8           Q     Do you see here, to introduce the  
9     document, at the top it says "E&C, U.S. House of  
10    Representatives, Committee on Energy and  
11    Commerce."

12                    Do you see that?

13          A     Yes.

14          Q     And it's dated May 4, 2018?

15          A     Yes.

16          Q     And do you -- below that it says:  
17    "Regarding hearing entitled 'Combatting the Opioid  
18    Epidemic,' examining concerns about distribution  
19    and diversion."

20                    Do you see that?

21          A     Yes.

22          Q     Okay. And if you go to the second page  
23    of this document, the paragraph below the chart  
24    that starts with "The U.S. continues." Do you see

1     that?

2             A       Yes.

3             Q       It says: "The U.S. continues to  
4     experience an opioid epidemic which has worsened  
5     over the last two decades. Opioid-involved  
6     overdose deaths are the leading cause of injury  
7     death in the U.S. and take the lives of 115  
8     Americans per day."

9                     Do you see that?

10            A       Yes.

11            Q       Have you ever seen or heard of that stat  
12     before?

13                     MR. COLLINS: Objection. Foundation.

14                     THE WITNESS: No.

15     BY MR. BOGLE:

16            Q       Any reason to dispute that?

17                     MR. COLLINS: Objection. Foundation,  
18     form, asked and answered.

19                     THE WITNESS: I couldn't say.

20     BY MR. BOGLE:

21            Q       Okay. It goes on to say: "According to  
22     a recent report issued by the Centers for Disease  
23     Control and Prevention, prescription or illicit  
24     opioids were involved in nearly two-thirds of all

1 drug overdose deaths in the U.S. during 2016, a  
2 27.7 percent increase from 2015."

3 Do you see that?

4 A Yes.

5 Q And it says: "In total, more than  
6 351,000 people have died since 1999 due to an  
7 opioid-involved overdose. The crisis has become  
8 so severe that the average life expectancy  
9 declined in 2016 from the previous year largely  
10 because of opioid overdoses."

11 Do you see that?

12 A Yes.

13 Q Okay. Have you ever heard that before,  
14 that the life expectancy in this country has  
15 declined largely because of opioid overdoses?

16 MR. COLLINS: Objection. Form,  
17 foundation.

18 THE WITNESS: No.

19 BY MR. BOGLE:

20 Q That's news to you?

21 MR. COLLINS: Objection. Argumentative.

22 THE WITNESS: Yes.



[illegible]

[illegible]



1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

[illegible]

[illegible]

[illegible]



[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

[illegible]



[illegible]

17 BY MR. BOGLE:

18 Q I'm going to hand you what I'm marking  
19 as Exhibit 1.1464, also marked as Exhibit 3.

20 (Snider Exhibit No. 3 was marked  
21 for identification.)

22 BY MR. BOGLE:

23 Q This is a letter from the U.S.  
24 Department of Justice, Drug Enforcement

1 Administration, September 27, 2006.

2 Do you see that?

3 A Yes.

4 Q Okay. Have you ever seen this letter  
5 before?

6 A No, I haven't.

7 Q You have not. Okay.

8 Communications from the DEA regarding  
9 your responsibilities at New Castle, do those  
10 generally not make their way to you?

11 MR. COLLINS: Objection. Assumes facts  
12 not in evidence, argumentative, foundation, form.

13 THE WITNESS: Yes, they made their way  
14 to us, and we would adopt -- adapt the manual and  
15 follow the SOPs and new procedures.

16 BY MR. BOGLE:

17 Q Okay. But you've never seen this  
18 letter?

19 A No, I'm sorry, I don't remember seeing  
20 it.

21 Q Well, let me ask you about a couple of  
22 things in here.

23 To start, it says: "This letter is  
24 being sent to every commercial entity in the

1 United States registered with the Drug Enforcement  
2 Administration to distribute controlled  
3 substances. The purpose of this letter is to  
4 reiterate the responsibilities of controlled  
5 substance distributors in view of the prescription  
6 drug abuse problem our nation currently faces."

7 Do you see that?

8 A Yes.

9 Q Okay. And then the third paragraph on  
10 the first page which starts with "Distributors  
11 are," do you see that sentence? It's the second  
12 sentence in that paragraph.

13 MR. COLLINS: Third paragraph, the  
14 second sentence.

15 THE WITNESS: Oh, okay.

16 BY MR. BOGLE:

17 Q It says: "Distributors are of course  
18 one of the key components of the distribution  
19 chain. If the closed system is to function  
20 properly as Congress envisioned, distributors must  
21 be vigilant in deciding whether a prospective  
22 customer can be trusted to deliver controlled  
23 substances only for lawful purposes."

24 Do you see that?

1           A       Yes.

2           Q       Do you agree with that statement?

3                   MR. COLLINS:  Objection.  Form.

4   Foundation.

5                   THE WITNESS:  Yes.

6   BY MR. BOGLE:

7           Q       It says:  "This responsibility is  
8   critical as Congress has expressly declared that  
9   the illegal distribution of controlled substances  
10   has a substantial and detrimental effect on the  
11   health and general welfare of the American  
12   people."

13                   Do you see that?

14          A       Yes.

15          Q       If you go to the second page here, I'm  
16   about three-quarters of the way down the page, the  
17   paragraph starting with "Thus."  Do you see that?

18          A       Yes.

19          Q       It says:  "Thus, in addition to  
20   reporting all suspicious orders, a distributor has  
21   a statutory responsibility to exercise due  
22   diligence to avoid filling suspicious orders that  
23   might be diverted into other than legitimate  
24   medical, scientific and industrial channels."

1 Do you see that?

2 A Yes.

3 Q Okay. But in 2006, I think we just  
4 talked about the fact that when a suspicious order  
5 was detected at your facility at least, it was  
6 filled, right?

7 MR. COLLINS: Objection. Form,  
8 foundation.

9 THE WITNESS: Not always.

10 BY MR. BOGLE:

11 Q Okay.

12 A I testified that not always. We would  
13 cut orders down on occasion.

14 Q When you thought they had fat fingers.  
15 I think that was the term you used.

16 A Or they -- yeah, or they made a mistake.

17 Q Right. But if you thought that they  
18 were ordering what they were -- intended to order,  
19 that order was filled, even though you're saying  
20 that a suspicious order report would have been  
21 provided to the DEA, right?

22 MR. COLLINS: Objection. Form.

23 THE WITNESS: If the definition is off  
24 of that report, three times or the eight times,

1     yes.

2     BY MR. BOGLE:

3             Q     Then it would have been filled, right?

4             A     Yes.

5             Q     Okay. And this letter from the DEA  
6     indicates that you shouldn't be filling those kind  
7     of prescriptions, right?

8                     MR. COLLINS: Objection.

9     BY MR. BOGLE:

10            Q     If you've identified them as suspicious.

11                   MR. COLLINS: Objection. Foundation,  
12     compound, argumentative, calls for a legal  
13     conclusion.

14                   THE WITNESS: I don't see it that way.

15     BY MR. BOGLE:

16            Q     You don't think that's what that says?

17            A     No.

18            Q     Okay. And the responsibility to avoid  
19     shipment of orders deemed suspicious by a  
20     distributor, that policy has always been in effect  
21     since the Controlled Substances Act was enacted in  
22     1970, right?

23                   MR. COLLINS: Objection. Form, assumes  
24     multiple facts, legal conclusion.

1 THE WITNESS: I can't say that. 1970,  
2 I -- I don't know that.

3 BY MR. BOGLE:

4 Q Well, do you think this -- this sentence  
5 I read to you here about avoiding filling  
6 suspicious orders was something new that was added  
7 to the regulations in '06?

8 MR. COLLINS: Objection. Calls for a  
9 hypothetical, speculation.

10 THE WITNESS: I don't know.

11 MR. COLLINS: Calls for a legal  
12 conclusion.

13 BY MR. BOGLE:

14 Q You don't know?

15 A No.

16 Q And the next paragraph down, the last  
17 sentence says: "Again, to maintain effective  
18 controls against diversion, as Section 823(e)  
19 requires, the distributor should exercise due care  
20 in confirming the legitimacy of all orders prior  
21 to filling." Right?

22 A Yes.

23 Q Okay. And you know that's not a new  
24 policy either, right?

1 MR. COLLINS: Objection.

2 BY MR. BOGLE:

3 Q In '06.

4 MR. COLLINS: Objection. Vague, calls  
5 for a legal conclusion.

6 THE WITNESS: I don't know that.

7 BY MR. BOGLE:

8 Q Okay. Do you have any disagreement that  
9 that's what the law required in '06?

10 MR. COLLINS: Objection. Calls for  
11 speculation, legal conclusion, asked and answered.

12 THE WITNESS: I have no disagreement  
13 with that it's -- that it's written there.

14 BY MR. BOGLE:

15 Q Okay. And would you agree with the  
16 notion that reporting a suspicious order to the  
17 DEA and not filling it gives the DEA the  
18 opportunity to investigate that order without  
19 having the potential of getting into the public  
20 for potential diversion?

21 MR. COLLINS: Objection, if that's a  
22 question. Calls for a legal conclusion, it's  
23 compound, it's vague.

24 BY MR. BOGLE:



1 Q You can answer.

2 MR. COLLINS: And it calls for  
3 speculation.

4 THE WITNESS: I can't answer to that. I  
5 don't know.

6 BY MR. BOGLE:

7 Q Okay. Do you think the DEA has the same  
8 ability to investigate and prevent diversion after  
9 you've filled the order versus if you hadn't  
10 filled it at all?

11 MR. COLLINS: Objection. Foundation,  
12 argumentative, compound.

13 THE WITNESS: I know in New Castle, we  
14 had a relationship with the DEA, and I talked to  
15 them, they called me. At one point the DEA agent  
16 in charge was my neighbor, so I knew them, and I  
17 knew if there was a problem, they would let me  
18 know.

19 MR. BOGLE: Move to strike as  
20 nonresponsive.

21 BY MR. BOGLE:

22 Q My -- my question simply was, if you  
23 fill an order that you deem suspicious, then it  
24 naturally is going to be harder to the DEA to

1 prevent diversion from that suspicious order as  
2 opposed to if you had reported it and not filled  
3 it at all, right?

4 MR. COLLINS: Objection. Closing  
5 argument. Assumes facts not in evidence, calls  
6 for speculation, form, compound, vague.

7 THE WITNESS: I don't know that.

8 BY MR. BOGLE:

9 Q You don't know.

10 A No.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]





■ [REDACTED]

2 BY MR. BOGLE:

3 Q Okay.

4 MR. COLLINS: Are you moving on to  
5 something else?

6 MR. BOGLE: Yeah.

7 MR. COLLINS: Can we take a short break?  
8 We've been going 70 minutes.

9 MR. BOGLE: That's fine.

10 THE VIDEOGRAPHER: The time is 9:42 a.m.  
11 We're going off the record.

12 (Recess.)

13 THE VIDEOGRAPHER: The time is 9:55 a.m.  
14 We're back on the record.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] ■ [REDACTED]

■ [REDACTED] [REDACTED]

5 THE WITNESS: According to Diane.

6 BY MR. BOGLE:

7 Q It -- and that's actually according to  
8 Alexandra, right?

9 A Or Alex -- Alexandra, yes.

10 Q Okay. What did she do at McKesson at  
11 that point in time? What was her job?

12 A Sales.

13 Q Okay. When Alexandra said something,  
14 was it generally accurate?

15 MR. COLLINS: Objection. Calls for  
16 speculation.

17 BY MR. BOGLE:

18 Q Did you find her to be inaccurate  
19 frequently in her e-mails?

20 MR. COLLINS: Objection. Speculation.

21 THE WITNESS: I can't -- I can't respond  
22 to her accuracy on e-mails.

23 BY MR. BOGLE:

■ [REDACTED] ■ [REDACTED]

Category	Percentage
1. Very high	95%
2. High	75%
3. Medium	90%
4. Low	65%
5. Very low	15%
6. Not sure	10%
7. Don't know	5%
8. No answer	2%
9. No opinion	1%
10. No response	1%
11. No data	1%
12. No information	1%
13. No knowledge	1%
14. No experience	1%
15. No contact	1%
16. No interaction	1%
17. No communication	1%
18. No connection	1%
19. No relationship	1%
20. No association	1%
21. No link	1%
22. No tie	1%
23. No bond	1%
24. No纽带	1%
25. No纽带	1%
26. No纽带	1%
27. No纽带	1%
28. No纽带	1%
29. No纽带	1%
30. No纽带	1%
31. No纽带	1%
32. No纽带	1%
33. No纽带	1%
34. No纽带	1%
35. No纽带	1%
36. No纽带	1%
37. No纽带	1%
38. No纽带	1%
39. No纽带	1%
40. No纽带	1%
41. No纽带	1%
42. No纽带	1%
43. No纽带	1%
44. No纽带	1%
45. No纽带	1%
46. No纽带	1%
47. No纽带	1%
48. No纽带	1%
49. No纽带	1%
50. No纽带	1%
51. No纽带	1%
52. No纽带	1%
53. No纽带	1%
54. No纽带	1%
55. No纽带	1%
56. No纽带	1%
57. No纽带	1%
58. No纽带	1%
59. No纽带	1%
60. No纽带	1%
61. No纽带	1%
62. No纽带	1%
63. No纽带	1%
64. No纽带	1%
65. No纽带	1%
66. No纽带	1%
67. No纽带	1%
68. No纽带	1%
69. No纽带	1%
70. No纽带	1%
71. No纽带	1%
72. No纽带	1%
73. No纽带	1%
74. No纽带	1%
75. No纽带	1%
76. No纽带	1%
77. No纽带	1%
78. No纽带	1%
79. No纽带	1%
80. No纽带	1%
81. No纽带	1%
82. No纽带	1%
83. No纽带	1%
84. No纽带	1%
85. No纽带	1%
86. No纽带	1%
87. No纽带	1%
88. No纽带	1%
89. No纽带	1%
90. No纽带	1%
91. No纽带	1%
92. No纽带	1%
93. No纽带	1%
94. No纽带	1%
95. No纽带	1%
96. No纽带	1%
97. No纽带	1%
98. No纽带	1%
99. No纽带	1%
100. No纽带	1%



15 Q Okay. When you got this e-mail in  
16 December 2007, did you write back and say, What is  
17 this chart? I don't know what this means?

18 MR. COLLINS: Objection. Calls for  
19 speculation, foundation.

20 THE WITNESS: I don't know from 2007.

21 BY MR. BOGLE:

22 Q Okay. Well, I can tell you I looked,  
23 and I didn't see any e-mail from you that said, I  
24 don't understand what this chart means, guys. Can



Category	Percentage
1. No answer	0%
2. Not applicable	0%
3. Not applicable	0%
4. Not applicable	0%
5. Not applicable	0%
6. Not applicable	0%
7. Not applicable	0%
8. Not applicable	0%
9. Not applicable	0%
10. Not applicable	0%
11. Not applicable	0%
12. Not applicable	0%
13. Not applicable	0%
14. Not applicable	0%
15. Not applicable	0%
16. Not applicable	0%
17. Not applicable	0%
18. Not applicable	0%
19. Not applicable	0%
20. Not applicable	0%
21. Not applicable	0%
22. Not applicable	0%
23. Not applicable	0%
24. Not applicable	0%
25. Not applicable	0%
26. Not applicable	0%
27. Not applicable	0%
28. Not applicable	0%
29. Not applicable	0%
30. Not applicable	0%
31. Not applicable	0%
32. Not applicable	0%
33. Not applicable	0%
34. Not applicable	0%
35. Not applicable	0%
36. Not applicable	0%
37. Not applicable	0%
38. Not applicable	0%
39. Not applicable	0%
40. Not applicable	0%
41. Not applicable	0%
42. Not applicable	0%
43. Not applicable	0%
44. Not applicable	0%
45. Not applicable	0%
46. Not applicable	0%
47. Not applicable	0%
48. Not applicable	0%
49. Not applicable	0%
50. Not applicable	0%
51. Not applicable	0%
52. Not applicable	0%
53. Not applicable	0%
54. Not applicable	0%
55. Not applicable	0%
56. Not applicable	0%
57. Not applicable	0%
58. Not applicable	0%
59. Not applicable	0%
60. Not applicable	0%
61. Not applicable	0%
62. Not applicable	0%
63. Not applicable	0%
64. Not applicable	0%
65. Not applicable	0%
66. Not applicable	0%
67. Not applicable	0%
68. Not applicable	0%
69. Not applicable	0%
70. Not applicable	0%
71. Not applicable	0%
72. Not applicable	0%
73. Not applicable	0%
74. Not applicable	0%
75. Not applicable	0%
76. Not applicable	0%
77. Not applicable	0%
78. Not applicable	0%
79. Not applicable	0%
80. Not applicable	0%
81. Not applicable	0%
82. Not applicable	0%
83. Not applicable	0%
84. Not applicable	0%
85. Not applicable	0%
86. Not applicable	0%
87. Not applicable	0%
88. Not applicable	0%
89. Not applicable	0%
90. Not applicable	0%
91. Not applicable	0%
92. Not applicable	0%
93. Not applicable	0%
94. Not applicable	0%
95. Not applicable	0%
96. Not applicable	0%
97. Not applicable	0%
98. Not applicable	0%
99. Not applicable	0%
100. Not applicable	0%

[illegible]

[illegible]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]			
■		[REDACTED]	[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]	[REDACTED]
■	[REDACTED]			
■		■	[REDACTED]	
■		■	[REDACTED]	
■		■	[REDACTED]	[REDACTED]
■	[REDACTED]			
■	[REDACTED]			
■		■	[REDACTED]	
■	[REDACTED]			
■		■	[REDACTED]	
■			[REDACTED]	[REDACTED]
■			[REDACTED]	[REDACTED]
■			[REDACTED]	[REDACTED]
■			[REDACTED]	[REDACTED]
■	[REDACTED]			
■			[REDACTED]	
■			[REDACTED]	[REDACTED]
■			[REDACTED]	[REDACTED]
■			[REDACTED]	[REDACTED]
■	[REDACTED]			
■			[REDACTED]	
■			[REDACTED]	[REDACTED]
■	[REDACTED]		[REDACTED]	
■	[REDACTED]			
■	[REDACTED]			
■			[REDACTED]	[REDACTED]
■			[REDACTED]	

[illegible]

Highly Confidential - Subject to Further Confidentiality Review

■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	



Category	Percentage
1. 100%	100%
2. 100%	100%
3. 100%	100%
4. 100%	100%
5. 100%	100%
6. 100%	100%
7. 100%	100%
8. 100%	100%
9. 100%	100%
10. 100%	100%
11. 100%	100%
12. 100%	100%
13. 100%	100%
14. 100%	100%
15. 100%	100%
16. 100%	100%
17. 100%	100%
18. 100%	100%
19. 100%	100%
20. 100%	100%
21. 100%	100%
22. 100%	100%
23. 100%	100%
24. 100%	100%
25. 100%	100%
26. 100%	100%
27. 100%	100%
28. 100%	100%
29. 100%	100%
30. 100%	100%
31. 100%	100%
32. 100%	100%
33. 100%	100%
34. 100%	100%
35. 100%	100%
36. 100%	100%
37. 100%	100%
38. 100%	100%
39. 100%	100%
40. 100%	100%
41. 100%	100%
42. 100%	100%
43. 100%	100%
44. 100%	100%
45. 100%	100%
46. 100%	100%
47. 100%	100%
48. 100%	100%
49. 100%	100%
50. 100%	100%
51. 100%	100%
52. 100%	100%
53. 100%	100%
54. 100%	100%
55. 100%	100%
56. 100%	100%
57. 100%	100%
58. 100%	100%
59. 100%	100%
60. 100%	100%
61. 100%	100%
62. 100%	100%
63. 100%	100%
64. 100%	100%
65. 100%	100%
66. 100%	100%
67. 100%	100%
68. 100%	100%
69. 100%	100%
70. 100%	100%
71. 100%	100%
72. 100%	100%
73. 100%	100%
74. 100%	100%
75. 100%	100%
76. 100%	100%
77. 100%	100%
78. 100%	100%
79. 100%	100%
80. 100%	100%
81. 100%	100%
82. 100%	100%
83. 100%	100%
84. 100%	100%
85. 100%	100%
86. 100%	100%
87. 100%	100%
88. 100%	100%
89. 100%	100%
90. 100%	100%
91. 100%	100%
92. 100%	100%
93. 100%	100%
94. 100%	100%
95. 100%	100%
96. 100%	100%
97. 100%	100%
98. 100%	100%
99. 100%	100%
100. 100%	100%

1		100	100
2		100	100
3		100	100
4		100	100
5		100	100
6	100	100	100
7		100	100
8	100	100	100
9	100	100	100
10	100	100	100
11	100	100	100
12	100	100	100
13	100	100	100
14	100	100	100
15	100	100	100
16	100	100	100
17	100	100	100
18	100	100	100
19	100	100	100
20	100	100	100
21	100	100	100
22	100	100	100
23	100	100	100
24	100	100	100
25	100	100	100
26	100	100	100
27	100	100	100
28	100	100	100
29	100	100	100
30	100	100	100
31	100	100	100
32	100	100	100
33	100	100	100
34	100	100	100
35	100	100	100
36	100	100	100
37	100	100	100
38	100	100	100
39	100	100	100
40	100	100	100
41	100	100	100
42	100	100	100
43	100	100	100
44	100	100	100
45	100	100	100
46	100	100	100
47	100	100	100
48	100	100	100
49	100	100	100
50	100	100	100
51	100	100	100
52	100	100	100
53	100	100	100
54	100	100	100
55	100	100	100
56	100	100	100
57	100	100	100
58	100	100	100
59	100	100	100
60	100	100	100
61	100	100	100
62	100	100	100
63	100	100	100
64	100	100	100
65	100	100	100
66	100	100	100
67	100	100	100
68	100	100	100
69	100	100	100
70	100	100	100
71	100	100	100
72	100	100	100
73	100	100	100
74	100	100	100
75	100	100	100
76	100	100	100
77	100	100	100
78	100	100	100
79	100	100	100
80	100	100	100
81	100	100	100
82	100	100	100
83	100	100	100
84	100	100	100
85	100	100	100
86	100	100	100
87	100	100	100
88	100	100	100
89	100	100	100
90	100	100	100
91	100	100	100
92	100	100	100
93	100	100	100
94	100	100	100
95	100	100	100
96	100	100	100
97	100	100	100
98	100	100	100
99			

[illegible]

1 BY MR. BOGLE:

2 Q Let me ask you this: If you had  
3 concerns about controlled substances going, and  
4 specifically opioids, going to a New Castle  
5 customer from 2000 to 2018, it was, first of all,  
6 your responsibility to raise that concern, right?

7 MR. COLLINS: Objection. Compound.  
8 Assumes facts not in evidence.

9 THE WITNESS: Yes.

10 BY MR. BOGLE:

11 Q Okay. You knew that was your job,  
12 right?

13 A Yes.

14 Q Okay. And ultimately, if you raised  
15 that concern, you were in a position of management  
16 at the DC when you did so, right?

17 A Yes.

18 Q Okay. You're somebody that people  
19 listen to, right?

20 A I can't answer that. I don't know.

21 Q You don't know if people listen to you?

22 A I'm sure they do. Some do, some don't.

23 Q Okay. As to Franklin's Pharmacy, for

23 Q Okay. Let's go back to Exhibit 1.1830,  
24 I think it's Exhibit 4 to the deposition. We were

1     talking about this --

2                   MR. COLLINS:   I'm sorry, hold on a  
3     second.

4                   MR. BOGLE:   Yeah, it's the PowerPoint  
5     deck you have right next to you, the Lifestyle  
6     Drug.

7     BY MR. BOGLE:

8           Q     We were talking about this a few moments  
9     ago.   I want to go to page .7 in this slide deck.

10                   It's noted here, the slide is titled

[REDACTED]



[illegible]



Category	Percentage
1. No answer	0%
2. Not applicable	0%
3. Yes	0%
4. No	0%
5. Yes	0%
6. No	0%
7. Yes	0%
8. No	0%
9. Yes	0%
10. No	0%
11. Yes	0%
12. No	0%
13. Yes	0%
14. No	0%
15. Yes	0%
16. No	0%
17. Yes	0%
18. No	0%
19. Yes	0%
20. No	0%
21. Yes	0%
22. No	0%
23. Yes	0%
24. No	0%
25. Yes	0%
26. No	0%
27. Yes	0%
28. No	0%
29. Yes	0%
30. No	0%
31. Yes	0%
32. No	0%
33. Yes	0%
34. No	0%
35. Yes	0%
36. No	0%
37. Yes	0%
38. No	0%
39. Yes	0%
40. No	0%
41. Yes	0%
42. No	0%
43. Yes	0%
44. No	0%
45. Yes	0%
46. No	0%
47. Yes	0%
48. No	0%
49. Yes	0%
50. No	0%
51. Yes	0%
52. No	0%
53. Yes	0%
54. No	0%
55. Yes	0%
56. No	0%
57. Yes	0%
58. No	0%
59. Yes	0%
60. No	0%
61. Yes	0%
62. No	0%
63. Yes	0%
64. No	0%
65. Yes	0%
66. No	0%
67. Yes	0%
68. No	0%
69. Yes	0%
70. No	0%
71. Yes	0%
72. No	0%
73. Yes	0%
74. No	0%
75. Yes	0%
76. No	0%
77. Yes	0%
78. No	0%
79. Yes	0%
80. No	0%
81. Yes	0%
82. No	0%
83. Yes	0%
84. No	0%
85. Yes	0%
86. No	0%
87. Yes	0%
88. No	0%
89. Yes	0%
90. No	0%
91. Yes	0%
92. No	0%
93. Yes	0%
94. No	0%
95. Yes	0%
96. No	0%
97. Yes	0%
98. No	0%
99. Yes	0%
100. No	0%



1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

A horizontal bar chart with 20 rows. Each row has a small square marker on the left, followed by a label, and then a horizontal bar representing a percentage. The bars are gray. The labels are: 1. [Marker] [Label], 2. [Marker] [Label], 3. [Marker] [Label], 4. [Marker] [Label], 5. [Marker] [Label], 6. [Marker] [Label], 7. [Marker] [Label], 8. [Marker] [Label], 9. [Marker] [Label], 10. [Marker] [Label], 11. [Marker] [Label], 12. [Marker] [Label], 13. [Marker] [Label], 14. [Marker] [Label], 15. [Marker] [Label], 16. [Marker] [Label], 17. [Marker] [Label], 18. [Marker] [Label], 19. [Marker] [Label], 20. [Marker] [Label]. The bars vary in length, representing different percentages for each category.

Category	Percentage
[Marker] [Label]	75%
[Marker] [Label]	90%
[Marker] [Label]	85%
[Marker] [Label]	20%
[Marker] [Label]	70%
[Marker] [Label]	80%
[Marker] [Label]	90%
[Marker] [Label]	10%
[Marker] [Label]	85%
[Marker] [Label]	95%
[Marker] [Label]	75%
[Marker] [Label]	80%
[Marker] [Label]	90%
[Marker] [Label]	25%
[Marker] [Label]	70%
[Marker] [Label]	95%
[Marker] [Label]	85%
[Marker] [Label]	90%
[Marker] [Label]	10%
[Marker] [Label]	80%
[Marker] [Label]	90%
[Marker] [Label]	75%
[Marker] [Label]	50%
[Marker] [Label]	70%
[Marker] [Label]	70%
[Marker] [Label]	70%



1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

[illegible]





1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

A horizontal bar chart with 20 rows. Each row has a small square icon on the left and a gray bar representing a percentage. The bars vary in length and position, with some starting at the left margin and others being indented. The longest bar is in the 9th row, extending nearly to the right margin. The shortest bar is in the 14th row, starting with an indentation and extending about one-third of the way across the chart area.

Row	Percentage (%)
1	85
2	90
3	55
4	95
5	90
6	90
7	75
8	95
9	98
10	85
11	90
12	90
13	90
14	35
15	20
16	85
17	85
18	85
19	85
20	85

A horizontal bar chart with 20 rows. Each row has a small square icon on the left and a corresponding horizontal bar. The bars vary in length and are filled with a solid gray color. The chart is set against a white background with a thin black border.

Category	Percentage
1	100%
2	55%
3	30%
4	100%
5	65%
6	85%
7	70%
8	60%
9	45%
10	65%
11	35%
12	65%
13	25%
14	25%
15	100%
16	100%
17	85%
18	90%
19	25%
20	100%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Sure. I'm just talking about 1.1 right  
9 now.

10 A (Peruses document.)  
11 Okay. What was your question?

12 Q Yeah. I'm just kind of orienting you at  
13 this point. You said you wanted to look at it, so  
14 I didn't really have one. I was trying to orient  
15 you to where we were at.

16 A Okay.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]





[illegible]



[illegible]

[illegible]

[illegible]

[illegible]

[REDACTED]

19 BY MR. BOGLE:

20 Q I'm going to hand you what I'm marking  
21 as Exhibit 1.1679, also Exhibit 7.

22 (Snider Exhibit No. 7 was marked  
23 for identification.)

24 BY MR. BOGLE:

1 Q Are you familiar with Dave Gustin?

2                    A            Yes.

3 Q Okay. He was in the regulatory  
4 department at McKesson, right?

5                    A            Yes.

6 Q Okay. I want to take a look at page .2  
7 here, the second page.

8 MR. COLLINS: I'm sorry. If you need to  
9 take more time to review it to familiarize  
10 yourself with the document, please do.

11 BY MR. BOGLE:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Figure 1.** The effect of the number of trials on the mean RTs for each condition.

[illegible]

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[illegible]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

☐ \_\_\_\_\_

Age Group	Percentage
18-24	10%
25-34	25%
35-44	35%
45-54	15%
55-64	10%
65-74	5%
75-84	5%
85+	5%

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

\_\_\_\_\_

\_\_\_\_\_

Government	Percentage
Current government	75%
Previous government	25%

[illegible][illegible]

Age Group	Percentage
18-24	10%
25-34	20%
35-44	30%
45-54	25%
55-64	15%
65-74	10%
75+	10%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

24 Q Okay. I'm also going to hand you what





17 BY MR. BOGLE:

18 Q Is that your understanding?

19 MR. COLLINS: Objection.

20 Mischaracterization.

21 THE WITNESS: Okay.

22 MR. COLLINS: Foundation.

23 BY MR. BOGLE:

24 Q Do you understand that to be the case?

1 MR. COLLINS: Objection. The question  
2 is vague.

3 BY MR. BOGLE:

4           Q     Is that threshold increases should be  
5     customer generated?

6 A Yes.

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

A horizontal bar chart with 20 rows. Each row has a small square icon on the left and a corresponding horizontal bar. The bars vary in length and position, representing different percentages. The categories are not explicitly labeled, but the bars represent data points for each category.

Category	Percentage
1	95%
2	90%
3	85%
4	88%
5	80%
6	35%
7	88%
8	95%
9	45%
10	65%
11	85%
12	90%
13	45%
14	65%
15	85%
16	95%
17	85%
18	88%
19	35%
20	85%



█ [REDACTED]

2 BY MR. BOGLE:

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

20 BY MR. BOGLE:

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			
■			

[illegible]

[illegible]

24 BY MR. BOGLE:



[illegible]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 BY MR. BOGLE:

14 Q Have they ever shown this document to  
15 you?

16 A I don't remember seeing this.

17 Q McKesson? Anybody? So nobody has ever  
18 talked to you about what the regional norms are  
19 for your -- the region that your distribution  
20 center covers --

21 MR. COLLINS: Objection --

22 BY MR. BOGLE:

23 Q -- for these controlled substances?

24 MR. COLLINS: Objection. The question



1 is compound and argumentative.

2 THE WITNESS: No, I've never seen the  
3 Northeast for all these DCs: Boston, New Castle,  
4 Rockhill, Buffalo.

5 BY MR. BOGLE:

6 Q Okay. You see this is an internal  
7 McKesson document, right?

8 MR. COLLINS: Objection. Lack of  
9 foundation.

10 BY MR. BOGLE:

11 Q It says "McKesson" on it.

12 A I don't -- I don't have any knowledge.

13 Q It's got a Bates stamp produced from  
14 defense counsel for McKesson, coming from  
15 McKesson's files. Do you see that?

16 MR. COLLINS: Objection. If you're  
17 testifying to that, that's fine. He doesn't have  
18 any knowledge of that.

19 BY MR. BOGLE:

20 Q Do you see that?

21 A I'm sorry. Can you --

22 Q First of all, McKesson, you see that?

23 MR. BOGLE: Can we highlight that?

24 THE WITNESS: I think I'll testify that

1 I've never seen this document before.

2 BY MR. BOGLE:

3 Q Yeah, I'm just asking.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

14 MR. COLLINS: Objection to the word

15 "regionally."

16 BY MR. BOGLE:

17 Q When you're out there conducting reviews

18 of customers, your due diligence component of --

19 of your job, you would agree with me that

20 assessing whether the customer has significant

21 business coming from pain clinics is relevant in

22 assessing whether to increase an opioid threshold,

23 right?

24 MR. COLLINS: Objection. Form,

1 foundation.

2 THE WITNESS: I would assess all aspects  
3 of the customer.

4 BY MR. BOGLE:

5 Q Right. And specifically, whether they  
6 do substantial business with pain clinics is  
7 relevant to consider whether to increase an opioid  
8 threshold, right?

9 A I'm not sure.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]









■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

5 Q I'm asking you a question. Okay. Just  
6 listen to my question.

7 A Okay.

8 Q When McKesson DC management or  
9 regulatory staff -- so DC management, that's you,  
10 right?

11 MR. COLLINS: Objection. You haven't  
12 established this witness has any firsthand  
13 knowledge of this document.

14 MR. BOGLE: That's the whole purpose is  
15 that if he doesn't, that's a big problem.

16 MR. COLLINS: The witness has already  
17 testified, and you're testifying as to what the  
18 contents are. Typically it goes question and  
19 answer where you elicit information from a  
20 witness.

21 MR. BOGLE: You're -- you're -- you're  
22 not even objecting. You're just talking.

23 MR. COLLINS: No, no, because you're  
24 ignoring the objection. The witness has no





[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■		[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	



















[illegible]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. BOGLE: Yeah. Let me look real  
14 quick. I think -- yeah. We can take a break now  
15 is good.

16 MR. COLLINS: Yep.

17 THE VIDEOGRAPHER: The time is  
18 11:14 a.m. We're going off the record.

19 (Recess.)

20 THE VIDEOGRAPHER: The time is 11:29  
21 a.m., and we're back on the record.

22 BY MR. BOGLE:

23 Q All right. Mr. Snider, the -- your New  
24 Castle Distribution Center is in -- located in

1 Pennsylvania, right?

2 A Yes.

3 Q Okay. But you guys service customers  
4 outside of the state of Pennsylvania, correct?

5 A Yeah -- oh, yes.

6 Q For example, you service customers in  
7 Ohio, right?

8 A Yes.

9 Q You service customers in West Virginia,  
10 right?

11 A Yes.

12 Q Okay. And we talked a little bit about  
13 the opioid epidemic earlier in your deposition,  
14 but you understand that West Virginia is one of  
15 the states that's been hit hardest by the opioid  
16 epidemic, right?

17 A Yes.

18 Q And In fact, there have been  
19 congressional investigations into McKesson's  
20 conduct specific to pharmacies supplied in West  
21 Virginia.

22 Do you understand that?

23 MR. COLLINS: Objection. Form.

24 THE WITNESS: I don't know that. I'm

1       sorry.

2       BY MR. BOGLE:

3               Q       Okay.  You've never been told that?

4               A       No.

5               Q       Okay.

6                       (Snider Exhibit No. 12 was marked  
7                       for identification.)

8       BY MR. BOGLE:

9               Q       I'm going to hand you 1.44, Exhibit 12  
10       to your deposition.

11                      Okay.  This is noted at the top to be  
12       from the House of Representatives, Congress of the  
13       United States, February 15, 2008.  Do you see  
14       that?

15              A       Yes.

16              Q       Okay.  And it's a letter sent to  
17       Mr. John Hammergren.  That's the CEO of McKesson,  
18       right?

19                      MR. COLLINS:  Objection.  Lack of  
20       foundation.

21                      THE WITNESS:  Yes.

22       BY MR. BOGLE:

23              Q       Do you see where it's -- he's noted to  
24       be the recipient, "Dear Mr. Hammergren"?

1           A           I would think he got it.

2                       MR. COLLINS:  Objection.

3   BY MR. BOGLE:

4           Q       Do you see that this was designed to be  
5   sent to him, right?

6                       MR. COLLINS:  Objection.  The witness  
7   has no firsthand knowledge.

8                       THE WITNESS:  I don't know anything  
9   about this document, so I can't answer to that.

10  BY MR. BOGLE:

11           Q       All right.  But you see it says, "Dear  
12  Mr. Hammergren," right?  Do you see that on the  
13  first page?

14           A       Yeah, I see that.

15           Q       You see that?

16           A       Yeah.

17           Q       Okay.  And so if you look at the first  
18  page of this document, it says in the second  
19  paragraph, "As part of our investigation."  Do you  
20  see that?

21           A       Yes.

22           Q       It says:  "As part of our investigation,  
23  the Committee wrote to you on May 8, 2017,  
24  regarding your distribution practices generally,

1 and in particular with respect to West Virginia.  
2 As we mentioned in the letter, the opioid epidemic  
3 has been particularly devastating to West  
4 Virginia. For example, in 2015, West Virginia had  
5 the highest opioid overdose death rate in the  
6 nation."

7 And then it goes on, the last sentence  
8 in that paragraph says: "Court filings also  
9 indicate that between 2007 and 2012, McKesson  
10 distributed 46,179,600 doses of hydrocodone and  
11 54,304,980 doses of oxycodone, meaning that  
12 McKesson shipped a total of 100,484,580 doses to  
13 West Virginia during this time period."

14 Have you ever seen that kind of data  
15 talking about the number of hydrocodone and  
16 oxycodone pills McKesson distributed to West  
17 Virginia during this time frame?

18 A No, I haven't.

19 Q Okay. You know that a fair amount of  
20 those pills that are being referenced here came  
21 from your distribution center, right?

22 MR. COLLINS: Objection. Lack of  
23 foundation. Lack of firsthand knowledge.

24 THE WITNESS: I don't know that.

1 BY MR. BOGLE:

2 Q Okay. Well, you know from 2007 to 2012  
3 that -- that the New Castle Distribution Center  
4 was sending hydrocodone and oxycodone to  
5 pharmacies in West Virginia, right?

6 A Yes.

7 Q Okay. So, therefore, you must present  
8 some of this number coming from New Castle, right?

9 MR. COLLINS: Objection. The question  
10 is vague.

11 THE WITNESS: If I could answer that,  
12 the DEA has done audits on us. We've never been  
13 found to do anything wrong. New Castle has an  
14 exemplary record.

15 MR. BOGLE: Move to strike as  
16 nonresponsive.

17 BY MR. BOGLE:

18 Q My question simply was, of these 100  
19 million plus doses referenced here, you know that  
20 a portion of those came from your distribution  
21 center --

22 MR. COLLINS: Objection.

23 BY MR. BOGLE:

24 Q -- during this time frame, correct?

1 MR. COLLINS: The question was asked and  
2 answered last -- a moment ago.

3 BY MR. BOGLE:

4 Q Correct?

5 MR. COLLINS: Same -- same objection.  
6 Asked and answered.

7 THE WITNESS: A -- a portion probably  
8 did.

9 BY MR. BOGLE:

10 Q Well, you know they did, right? From  
11 2007 to 2012, you know that the New Castle  
12 Distribution Center was servicing West Virginia  
13 pharmacies, right? So it has to be part of this  
14 number, true?

15 MR. COLLINS: Objection.

16 BY MR. BOGLE:

17 Q You know that.

18 MR. COLLINS: Objection. The question  
19 is compound three different ways. It's  
20 argumentative. It's been asked and answered.

21 BY MR. BOGLE:

22 Q You know that, don't you?

23 MR. COLLINS: Objection. Form.

24 THE WITNESS: I've never seen this





[illegible]



1 litigation, though, didn't you?

2 A Yes.

3 Q Okay. All right. I'm going to hand  
4 you -- marking as Exhibit 13, also Exhibit 1.1824.

5 (Snider Exhibit No. 13 was marked  
6 for identification.)

7 BY MR. BOGLE:

8 Q Okay. And you see this is a document;  
9 the first page entitled "Mace's Pharmacy"; do you  
10 see that?

11 A Yes.

12 Q Okay. Thereafter, this is all provided  
13 to us as one document.

14 Does this look like your file from  
15 Mace's Pharmacy for 2008 to 2010?

16 MR. COLLINS: Objection.

17 THE WITNESS: I don't know all of it.

18 BY MR. BOGLE:

19 Q You don't -- excuse me?

20 A I don't know all of it. I haven't seen  
21 it yet.

22 Q Okay. Let's take a look at it.

23 A I'd have to go through them.

24 Q Okay. Let's take a look at it. First





1 Q Okay. And Brian Ferreira, I think you  
2 said was vice president/general manager?

3 A Yes.

4 Q What sort of oversight did Brian  
5 Ferreira provide for you?

6 A He was in charge of the distribution  
7 center over all the operations, my boss, and Jim  
8 reported to him directly.

9 Q Reported to him, you said?

10 A Yeah.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 MR. COLLINS: Objection. Lack of  
8 foundation.

9 BY MR. BOGLE:

10 Q To investigate your concerns here.

11 MR. COLLINS: Objection. Lack of  
12 foundation.

13 THE WITNESS: I'm sorry, I'd have to  
14 look through it.

15 BY MR. BOGLE:

16 Q Okay.

17 A You want me to do that?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]





[illegible]









1           Q     Is that something you guys would look at  
2     back in 2008 when evaluating a request like this?

3           A     I can't --

4                     MR. COLLINS:   Object -- objection to the  
5     term we -- "you would look at."

6     BY MR. BOGLE:

7           Q     Would you?

8           A     No, I don't know.

9           Q     Okay.

10          A     I can't speculate on that.

11          Q     Okay.  So if, for example, the city of  
12     Philippi, West Virginia, had fewer than 3,000  
13     people in it around this time frame, would that  
14     raise concerns to you about how much hydrocodone  
15     you're giving this company -- this pharmacy?

16                     MR. COLLINS:  Objection.  Assumes facts  
17     not in evidence, lack of foundation.

18                     MR. BOGLE:  Let's put it into evidence.  
19     Exhibit 14, 1.1892.

20                     (Snider Exhibit No. 14 was marked  
21     for identification.)

22     BY MR. BOGLE:

23          Q     Here is the Census Bureau data for  
24     Philippi, West Virginia, from 2010.  Do you see





[illegible]

[illegible]

[illegible]

A horizontal bar chart with 25 rows. Each row consists of a small square marker on the left and a horizontal bar of varying length extending to the right. The bars are gray and set against a light gray background with white horizontal grid lines. The lengths of the bars vary significantly, representing different percentages for each category. The bars are ordered from top to bottom as they appear in the image.

Category	Percentage
1	85%
2	75%
3	95%
4	45%
5	70%
6	20%
7	90%
8	95%
9	55%
10	25%
11	55%
12	45%
13	70%
14	75%
15	65%
16	20%
17	70%
18	25%
19	95%
20	85%
21	90%
22	75%
23	95%
24	80%
25	90%

Category	Percentage
1. Very high	92%
2. High	42%
3. Medium	18%
4. Low	50%
5. Very low	18%
6. Not at all	32%
7. Don't know	88%
8. No answer	22%
9. No opinion	88%
10. No response	92%
11. No data	18%
12. No information	32%
13. No access	92%
14. No contact	18%
15. No communication	32%
16. No interaction	88%
17. No participation	82%
18. No involvement	18%
19. No engagement	32%
20. No contribution	88%
21. No input	82%
22. No output	18%
23. No result	42%
24. No achievement	88%
25. No success	82%
26. No failure	18%
27. No loss	32%
28. No gain	42%
29. No benefit	88%
30. No harm	82%
31. No risk	18%
32. No danger	32%
33. No threat	88%
34. No danger	82%
35. No risk	18%
36. No harm	32%
37. No benefit	88%
38. No gain	82%
39. No loss	18%
40. No failure	32%
41. No success	88%
42. No achievement	82%
43. No result	18%
44. No output	32%
45. No input	88%
46. No contribution	82%
47. No engagement	18%
48. No involvement	32%
49. No participation	88%
50. No interaction	82%
51. No communication	18%
52. No contact	32%
53. No access	88%
54. No information	82%
55. No data	18%
56. No response	32%
57. No opinion	88%
58. No answer	82%
59. Don't know	18%
60. Not at all	32%
61. Low	88%
62. Medium	82%
63. High	18%
64. Very high	32%

[illegible]

[illegible]

A 15x15 grid of squares. The squares are arranged in 15 rows and 15 columns. The following squares are filled with gray:

- Row 1: Column 3
- Row 2: Column 4
- Row 3: Column 1
- Row 4: Column 4
- Row 5: Column 3
- Row 6: Column 4
- Row 7: Column 1
- Row 8: Column 3
- Row 9: Column 4, Column 7, Column 15
- Row 10: Column 1, Column 5
- Row 11: Column 3
- Row 12: Column 4
- Row 13: Column 1
- Row 14: Column 1, Column 2, Column 3, Column 4, Column 5, Column 6, Column 7, Column 8, Column 9, Column 10, Column 11, Column 12, Column 13, Column 14, Column 15
- Row 15: Column 1

20 Q Yeah.

21 MR. BOGLE: Let's go off the record.

22 You can go through it.

23 MR. COLLINS: No, no, we're going to  
24 stay on the record.



1                   MR. BOGLE: We don't need to stay on the  
2     record. If he wants time to look at it, he can,  
3     but don't stay on the record. There's no such  
4     requirement.

5                   MR. COLLINS: Well, listen, to go off  
6     the record, you need an agreement. So if you want  
7     to have him start leafing through documents, we're  
8     staying on the record.

9                   MR. BOGLE: Okay. That's fine. We'll  
10    do that.

11   BY MR. BOGLE:

12                Q     You can't point me to anything that  
13    shows that you requested any prescription data,  
14    can you?

15                MR. COLLINS: He just asked to go  
16    through documents. You want him to go through  
17    documents --

18                MR. BOGLE: He's not going to blow  
19    through hours of my time looking at something that  
20    he should already be familiar with.

21                MR. COLLINS: Well, no, he -- this isn't  
22    a 30(b)(6) deposition.

23                MR. BOGLE: Doesn't have to be.

24                MR. COLLINS: This is in his personal

1 capacity. So, listen, if you want him to look  
2 through documents, he will do it for you, but it's  
3 on your time.

4 Take as much time as you want.

5 THE WITNESS: (Peruses document.)

6 BY MR. BOGLE:

7 Q We're in December 2009.

8 A (Peruses document.)

9 On the questionnaire on page .13, Dale  
10 reviewed the scripts.

11 Q .13?

12 A Yes.

13 Q So that's from June 2007, right?

14 A Yes.

15 Q Okay. We're talking about December  
16 2009.

17 A Oh.

18 Q And a specific increase that they're  
19 saying -- in request in December 2009.

20 A (Peruses document.)

21 Q All right. I've got too many documents  
22 to go through. I'll strike the question and keep  
23 going.

24 Let's look at page .84.

[illegible]

A horizontal bar chart titled "U.S. should take action to reduce greenhouse gas emissions." The y-axis lists age groups: 18-29, 30-49, 50-64, 65+, and "Don't know." The x-axis shows percentages from 0% to 100%. For each age group, there are two bars: a blue bar for "Men" and an orange bar for "Women." The data is as follows:

Age Group	Men (%)	Women (%)
18-29	92	92
30-49	88	88
50-64	68	68
65+	85	85
Don't know	95	95

[illegible]

[illegible]

[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	



The chart consists of 20 horizontal bars, each preceded by a small square icon. The bars vary in their starting and ending horizontal positions, creating a fragmented visual effect. The bars are distributed across the width of the chart area, with some starting at the left edge and others indented.

20 Q Okay. But you do know the CSMP requires  
21 that, right, documentation?

22           A       Not on my file, no.

23 Q That's not my question, sir.

24 The CSMP requires documentation

1 supporting any change made to a threshold based on  
2 business growth, right?

3 MR. COLLINS: Objection. Assumes facts  
4 not in evidence.

5 BY MR. BOGLE:

6 Q We just looked at this a few minutes  
7 ago.

8 MR. COLLINS: Objection. Show it to him  
9 again.

10 BY MR. BOGLE:

11 Q You don't recall that?

12 A I'm sorry. I don't -- you'll have to  
13 repeat the question.

14 Q My question was, to support a threshold  
15 change based on business growth, supporting  
16 documentation is required under the CSMP, right?

17 MR. COLLINS: Objection. Assumes --

18 BY MR. BOGLE:

19 Q As of 10/2010?

20 MR. COLLINS: Objection. Assumes facts  
21 not in evidence.

22 THE WITNESS: I don't know that that  
23 wasn't provided.

24 BY MR. BOGLE:

1 Q Not my question, sir. That was  
2 required, wasn't it?

3 MR. COLLINS: Objection. Form.

4 BY MR. BOGLE:

5 Q Yes or no?

6 MR. COLLINS: Objection.

7 BY MR. BOGLE:

8 Q Or you don't know?

9 MR. COLLINS: Objection to form.

10 THE WITNESS: I don't know.

[illegible]

22 Q Okay. So in the McKesson files that  
23 have been produced to us pertaining to this  
24 increase, we should find some supporting

1 documentation if the CSMP was followed, right?

2 I'm not saying in your files or whose files. It  
3 should be in somebody's files.

4 A I don't know that.

5 Q You don't know.

6 A I can't testify to what's in their  
7 files.

8 Q I didn't ask -- I didn't say "is it." I  
9 said "should it be."

10 A I can't --

11 MR. COLLINS: Objection. Calls for a  
12 legal conclusion.

13 THE WITNESS: I can't testify. It was  
14 electronic.

15 BY MR. BOGLE:

16 Q Okay. Was there a policy at McKesson in  
17 2010 to destroy evidence of due diligence review?

18 MR. COLLINS: Objection. Argumentative.  
19 Object to the theatrics.

20 BY MR. BOGLE:

21 Q There's a question.

22 A Can you repeat the question?

23 Q Was there a policy written or unwritten  
24 at McKesson in October 2010 to destroy evidence of



[illegible]

Category	Percentage
1. Very high	95%
2. High	85%
3. Moderate	55%
4. Low	80%
5. Very low	45%
6. Not at all	50%
7. Don't know	10%
8. No answer	10%
9. No opinion	85%
10. No response	95%
11. No data	55%
12. No information	80%
13. No access	25%
14. No contact	10%
15. No communication	80%
16. No interaction	25%
17. No participation	80%
18. No involvement	55%
19. No engagement	10%
20. No contribution	10%
21. No input	80%
22. No output	25%
23. No result	80%
24. No achievement	10%
25. No success	80%
26. No failure	10%
27. No loss	80%
28. No gain	10%
29. No benefit	80%
30. No harm	10%
31. No risk	80%
32. No danger	10%
33. No threat	80%
34. No danger	10%
35. No risk	80%
36. No harm	10%
37. No benefit	80%
38. No gain	10%
39. No loss	80%
40. No failure	10%
41. No success	80%
42. No achievement	10%
43. No result	80%
44. No output	25%
45. No input	80%
46. No contribution	10%
47. No engagement	10%
48. No involvement	80%
49. No participation	25%
50. No interaction	10%
51. No communication	80%
52. No contact	10%
53. No access	80%
54. No information	10%
55. No data	80%
56. No response	10%
57. No opinion	80%
58. No answer	10%
59. Don't know	80%
60. Not at all	10%
61. Very low	80%
62. Low	25%
63. Moderate	80%
64. High	10%
65. Very high	80%

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100





[REDACTED]

17 MR. COLLINS: Objection. We've been

18 over this --

19 BY MR. BOGLE:

20 Q Right?

21 MR. COLLINS: -- a dozen times.

22 Objection. Mischaracterization.

23 BY MR. BOGLE:

24 Q Right?









[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 Q Okay. Do you know about how many people  
17 lift in Weston, West Virginia?

18 A A lot more than Philippi.

19 Q Think so?

20 A Yes.

21 Q Okay. Would it surprise you that it's  
22 fewer than 5,000 people?

23 A In that area?

24 Q In Weston, West Virginia.

1           A       Yes.

2           Q       That would surprise you?

3           A       Yes.

4                   (Snider Exhibit No. 17 was marked  
5                   for identification.)

6   BY MR. BOGLE:

7           Q       I hand you Exhibit 1.1909 marked as  
8   Exhibit 17.

9                   It says: "Population data for Weston,  
10   West Virginia," indicated to have a population of  
11   4,085 people. Do you see that?

12                  MR. COLLINS: Objection. Lack of  
13   foundation, lack of authentication, lack of  
14   knowledge.

15                  THE WITNESS: What year is this, please?

16   BY MR. BOGLE:

17           Q       This is the current data.

18                  MR. COLLINS: Yeah, I mean -- it's the  
19   internet, it's accurate.

20                  THE WITNESS: What's that?

21                  MR. BOGLE: Well, I'm sure you guys are  
22   going to produce census data that shows otherwise,  
23   so we'll just wait to see that.

24                  MR. COLLINS: I'll withdraw my



1 objection.

2 MR. BOGLE: I would hope so.

3 MR. COLLINS: It's a lack of foundation,  
4 lack of knowledge.

5 BY MR. BOGLE:

6 Q 4,085 people, right? That's what it  
7 says.

8 A That's what it says right here.

9 Q Right. That's wrong; is that your  
10 testimony?

11 MR. COLLINS: Objection. Lack of  
12 foundation. You haven't established the witness  
13 has any knowledge about this issue.

14 MR. BOGLE: Well, he said he thought it  
15 was wrong.

16 THE WITNESS: I said I was surprised,  
17 and I am. I'm sorry.

18 BY MR. BOGLE:

19 Q You're surprised?

20 A Yes.

[REDACTED]













[illegible]



[illegible]







■	[REDACTED]	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■	■	[REDACTED]
■		[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■		[REDACTED]
■	[REDACTED]	









1	2	3	4	5
6	7	8	9	10
11	12	13	14	15
16	17	18	19	20
21	22	23	24	25
26	27	28	29	30
31	32	33	34	35
36	37	38	39	40
41	42	43	44	45
46	47	48	49	50
51	52	53	54	55
56	57	58	59	60
61	62	63	64	65
66	67	68	69	70
71	72	73	74	75
76	77	78	79	80
81	82	83	84	85
86	87	88	89	90
91	92	93	94	95
96	97	98	99	100
101	102	103	104	105
106	107	108	109	110
111	112	113	114	115
116	117	118	119	120
121	122	123	124	125
126	127	128	129	130
131	132	133	134	135
136	137	138	139	140
141	142	143	144	145
146	147	148	149	150
151	152	153	154	155
156	157	158	159	160
161	162	163	164	165
166	167	168	169	170
171	172	173	174	175
176	177	178	179	180
181	182	183	184	185
186	187	188	189	190
191	192	193	194	195
196	197	198	199	200
201	202	203	204	205
206	207	208	209	210
211	212	213	214	215
216	217	218	219	220
221	222	223	224	225
226	227	228	229	230
231	232	233	234	235
236	237	238	239	240
241	242	243	244	245
246	247	248	249	250
251	252	253	254	255
256	257	258	259	260
261	262	263	264	265
266	267	268	269	270
271	272	273	274	275
276	277	278	279	280
281	282	283	284	285
286	287	288	289	290
291	292	293	294	295
296	297	298	299	300
301	302	303	304	305
306	307	308	309	310
311	312	313	314	315
316	317	318	319	320
321	322	323	324	325
326	327	328	329	330
331	332	333	334	335
336	337	338	339	340
341	342	343	344	345
346	347	348	349	350
351	352	353	354	355
356	357	358	359	360
361	362	363	364	365
366	367	368	369	370
371	372	373	374	375
376	377	378	379	380
381	382	383	384	385
386	387	388	389	390
391	392	393	394	395
396	397	398	399	400
401	402	403	404	405
406	407	408	409	410
411	412	413	414	415
416	417	418	419	420
421	422	423	424	425
426	427	428	429	430
431	432	433	434	435
436	437	438	439	440
441	442	443	444	445
446	447	448	449	450
451	452	453	454	

[illegible]







[illegible]

[illegible]









[illegible]





[illegible]

[illegible]





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

13 MR. COLLINS: Are you -- I'm sorry.

14 We've been going 70 minutes. Is this a good time  
15 to break?

16 MR. BOGLE: That's fine. I'm moving to  
17 a different pharmacy. That's fine.

18 THE VIDEOGRAPHER: The time is 12:47  
19 p.m. We're going off the record.

20 (Lunch recess.)

21 THE VIDEOGRAPHER: The time is  
22 1:35 p.m., and we're back on the record.

23 BY MR. BOGLE:

24 Q All right, Mr. Snider, we're back from

1 lunch. I wanted to pick up from where we were  
2 talking about before we broke.

1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			
33			
34			
35			
36			
37			
38			
39			
40			
41			
42			
43			
44			
45			
46			
47			
48			
49			
50			
51			
52			
53			
54			
55			
56			
57			
58			
59			
60			
61			
62			
63			
64			
65			
66			
67			
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			
78			
79			
80			
81			
82			
83			
84			
85			
86			
87			
88			
89			
90			
91			
92			
93			
94			
95			
96			
97			
98			
99			
100			

[illegible]

1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
37	38	39
40	41	42
43	44	45
46	47	48
49	50	51
52	53	54
55	56	57
58	59	60
61	62	63
64	65	66
67	68	69
70	71	72
73	74	75
76	77	78
79	80	81
82	83	84
85	86	87
88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

[illegible]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

4 Q All right. Now, Lumberport, you  
5 understand that's another very small city, right?

6 MR. COLLINS: Objection.

7 BY MR. BOGLE:

8 Q In West Virginia.

9 MR. COLLINS: Objection to form.

10 THE WITNESS: I don't remember.

11 BY MR. BOGLE:

12 Q Okay. Have you ever been to Lumberport?

13 A No, I don't remember being there.

14 Q Okay.

15 (Snider Exhibit No. 19 was marked  
16 for identification.)

17 BY MR. BOGLE:

18 Q I hand you Exhibit 19.

19 Actually, let me ask you this: If the  
20 census data indicated there were fewer than a  
21 thousand people living in Lumberport, would you  
22 have reason to dispute that?

23 MR. COLLINS: Again, foundation.

24 THE WITNESS: I wouldn't know. I'd have



1 no reason to dispute it.

2 BY MR. BOGLE:

3 Q Okay. Let's just take a look real quick  
4 then. Exhibit 19, also marked as 1.1908, is what  
5 I'm handing you.

6 All right. It's another printout with  
7 population and other data. You see it's for  
8 Lumberport, West Virginia?

9 A Yes, I see.

10 Q And this is the most current data that I  
11 was able to obtain. The population noted here for  
12 Lumberport is 881 people. Do you see that?

13 A Yes.

14 Q Okay. Do you have any specific  
15 knowledge that would contradict that being the  
16 most current population data for Lumberport?

17 MR. COLLINS: Objection. Foundation.

18 THE WITNESS: I don't have any knowledge  
19 of the surrounding area of Lumberport.

20 BY MR. BOGLE:

21 Q Okay. All right. So let's go back to  
22 Exhibit 1.1821, and I want to specifically look at  
23 .19 is the page.

24 A Can you give me that exhibit again?

1 Q It's 1.1821, the page is .19. The page  
2 should look like this (indicating).

3 MR. COLLINS: He's referring to the  
4 numbers at the top.

5 THE WITNESS: Oh, 1821.19, okay.

6 BY MR. BOGLE:

7 Q Yeah.

8 A Thank you.

9 Q Are you at that page?

10 A Yes.

[REDACTED]



[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

[illegible]

[illegible]

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100



[illegible]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		

[illegible]

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100
101	102	103	104
105	106	107	108
109	110	111	112
113	114	115	116
117	118	119	120
121	122	123	124
125	126	127	128
129	130	131	132
133	134	135	136
137	138	139	140
141	142	143	144
145	146	147	148
149	150	151	152
153	154	155	156
157	158	159	160
161	162	163	164
165	166	167	168
169	170	171	172
173	174	175	176
177	178	179	180
181	182	183	184
185	186	187	188
189	190	191	192
193	194	195	196
197	198	199	200
201	202	203	204
205	206	207	208
209	210	211	212
213	214	215	216
217	218	219	220
221	222	223	224
225	226	227	228
229	230	231	232
233	234	235	236
237	238	239	240
241	242	243	244
245	246	247	248
249	250	251	252
253	254	255	256
257	258	259	260
261	262	263	264
265	266	267	268
269	270	271	272
273	274	275	276
277	278	279	280
281	282	283	284
285	286	287	288
289	290	291	292
293	294	295	296
297	298	299	300
301	302	303	304
305	306	307	308
309	310	311	312
313	314	315	316
317	318	319	320
321	322	323	324
325	326	327	328
329	330	331	332
333	334	335	336
337	338	339	340
341	342	343	344
345	346	347	348
349	350	351	352
353	354	355	356
357	358	359	360
361	362	363	364
365	366	367	368
369	370	371	372
373	374	375	376
377	378	379	380
381	382	383	384
385	386	387	388
389	390	391	392
393	394	395	396
397	398	399	400
401	402	403	404
405	406	407	408
409	410	411	412
413	414	415	416
417	418	419	420
421	422	423	424
425	426	427	428
429	430	431	432
433	434	435	436
437	438	439	440

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12           A       Yes, I do.

13           Q       Okay. And Belington, West Virginia, do  
14 you know anything about the population for that  
15 city?

16           A       No, I don't. I don't. I don't think I  
17 remember being there.

18           Q       Okay. Any reason to dispute they have  
19 about 2,000 people in Belington, West Virginia?

20                   MR. COLLINS: Objection. Foundation.

21                   THE WITNESS: I wouldn't dispute that.  
22 I don't know.

23                   (Snider Exhibit No. 20 was marked  
24 for identification.)

1 BY MR. BOGLE:

2 Q Okay. And I want to look at some of the  
3 documentation on the Belington location. I hand  
4 you Exhibit 20, also marked as Exhibit 1.1822.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]	[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	[REDACTED]
■	[REDACTED]	[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■		[REDACTED]
■	[REDACTED]	
■	■	[REDACTED]
■	[REDACTED]	
■		[REDACTED] [REDACTED] [REDACTED]
■		[REDACTED] [REDACTED]
■	[REDACTED]	
■	[REDACTED]	



[illegible]

[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

Category	Percentage
1	85
2	70
3	30
4	25
5	30
6	30
7	100
8	90
9	15
10	25
11	10
12	85
13	60
14	90
15	50
16	30
17	30
18	30
19	65
20	90
21	40
22	30
23	30
24	30
25	100
26	40
27	25
28	10
29	30
30	30
31	30
32	85
33	100
34	25

[illegible]



1 Q Huh?

2 A I didn't produce it. I don't know.

3 Q I'm just asking you if you see the  
4 police report in this packet related to this  
5 pharmacy.

6 MR. COLLINS: Objection. Argumentative.

7 THE WITNESS: I don't see it in here.

8 BY MR. BOGLE:

9 Q Okay. Are you aware that ultimately one  
10 of the owners of Best Care was prosecuted for  
11 illegally diverting opioids?

12 A I am aware that an owner of Best Care  
13 was prosecuted, and we cut them off.

14 Q Well, you're aware that there was a --  
15 there was an arrest and a prosecution for one of  
16 the owners of Best Care for diversion of opioid  
17 products, right?

18 MR. COLLINS: Objection. Foundation.

19 THE WITNESS: I was aware that he was  
20 arrested. That's all.

21 (Snider Exhibit No. 21 was marked  
22 for identification.)

23 BY MR. BOGLE:

24 Q Okay. Let me hand you 1.1251,



1 Exhibit 21.

2 This is a news release from the U.S.  
3 Department of Justice, June 3rd, 2014, titled  
4 "Pharmacist charged with illegal distribution of  
5 painkillers."

6 Do you see that?

7 A Yes.

8 Q Have you ever seen this press release  
9 related to Best Care?

10 A No, I haven't.

11 Q Okay. How did you become aware of the  
12 arrest then?

13 A I don't remember. Probably the DRA.

14 Q Okay. And if you look in the press  
15 release, it says: "A West Virginia pharmacist has  
16 been indicted on charges that he dispensed  
17 prescription painkillers outside the scope of his  
18 professional practice."

19 And then it says: "United States  
20 Attorney William Ihlenfeld, II, announced that  
21 Mario Blount, 51, of Bridgeport, West Virginia,  
22 was arrested this morning on charges of conspiracy  
23 to possess and distribute Schedule II controlled  
24 substances, distribution of oxycodone and a

1 failure to report the filling of a prescription."

2 Do you see that?

3 A Yes.

4 Q And it says: "Blount, who was employed  
5 by Best Care Pharmacy, is alleged to have  
6 conspired with two other individuals over the last  
7 three years to distribute prescription painkillers  
8 for non-legitimate medical purposes."

9 Do you see that reference?

10 A Yes.

11 Q Okay. And skip a paragraph, the next  
12 one says: "The Greater Harrison County Drug Task  
13 Force executed search warrants in October 2013 at  
14 Best Care Pharmacy locations in the West Virginia  
15 towns of Bridgeport, Lumberport and Belington."

16 Do you see that?

17 A Yes.

18 Q And that's the three facilities we've  
19 just been looking at over the last hour or so,  
20 right?

21 A Yes.

22 Q And then the last paragraph on this page  
23 says: "Mr. Blount abused the trust of the  
24 citizens of Bridgeport and the customers of Best

1 Care Pharmacy. These arrests serve as a warning  
2 that the illicit distribution of controlled  
3 substances will not be tolerated in Harrison  
4 County, said Karl C. Colder, Special Agent in  
5 Charge, Drug Enforcement Administration,  
6 Washington, D.C. Field Division. Over  
7 approximately three years, Mr. Blount illegally  
8 dispensed over 11,000 oxycodone and oxymorphone  
9 pills."

10 Do you see that?

11 A I see that, yes.

12 Q And you know McKesson was the supplier  
13 of those pills, right?

14 MR. COLLINS: Objection. Assumes facts  
15 not in evidence, foundation.

16 THE WITNESS: I don't know that.

17 BY MR. BOGLE:

18 Q Well, your New Castle facility was  
19 supplying Best Care with those very drugs during  
20 that very time period, right?

21 MR. COLLINS: Objection. Argumentative,  
22 assumes facts not in evidence.

23 THE WITNESS: I don't know that.

24 BY MR. BOGLE:

1 Q You don't know if you were supplying  
2 them?

3 A No.

4 MR. COLLINS: Objection.

5 BY MR. BOGLE:

6 Q You don't know if Best Care Pharmacy was  
7 a customer of yours for 2010 to 2014?

8 MR. COLLINS: Objection. Argumentative.

9 BY MR. BOGLE:

10 Q I'm just asking if you know or not.

11 MR. COLLINS: Objection. You just asked  
12 the same -- you've asked the same question two or  
13 three times.

14 THE WITNESS: I don't know.

15 BY MR. BOGLE:

16 Q You don't know?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. COLLINS: Objection. Assumes facts  
2 not in evidence. The question is compound.

3 THE WITNESS: I don't -- I don't know  
4 that. He could have other wholesalers. I don't  
5 know that.

6 BY MR. BOGLE:

7 Q You don't even know if he had other  
8 wholesalers?

9 A I don't remember that, no.

10 Q Okay.

11 A No.

12 Q Isn't that something you would need --  
13 that you would want to know?

14 MR. COLLINS: Objection. Calls for a  
15 legal conclusion, argumentative.

16 THE WITNESS: I would want the director  
17 of Regulatory Affairs to know that.

18 BY MR. BOGLE:

19 Q You would want him to know that. It's  
20 okay, as the guy who is responsible for making  
21 sure that the New Castle isn't involved in  
22 diversion, you don't care if you know that or not?

23 MR. COLLINS: Objection. Argumentative.  
24 Object to the theatrics.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. COLLINS: Objection. The  
11 question --

12 BY MR. BOGLE:

13 Q Right?

14 MR. COLLINS: Well, the question is now  
15 compound three times.

16 THE WITNESS: I -- I answered that, yes.

17 BY MR. BOGLE:

18 Q Yes, you were. Okay.

19 And you said this pharmacy was cut off.  
20 They were cut off for about two weeks, right, Best  
21 Care?

22 MR. COLLINS: Objection. Assumes facts  
23 not in evidence, foundation.

24 THE WITNESS: I don't remember.

1 BY MR. BOGLE:

2 Q You don't remember?

3 A No.

4 Q Okay.

5 A That would be the director of Regulatory  
6 Affairs.

7 Q Well, the pills come out of your  
8 facility, right?

9 MR. COLLINS: Objection.

10 THE WITNESS: I don't know that. I  
11 answered to that.

12 BY MR. BOGLE:

13 Q Does -- does Regulatory Affairs run your  
14 facility?

15 MR. COLLINS: Objection. Form. The  
16 question is vague.

17 BY MR. BOGLE:

18 Q I mean, do you defer all responsibility  
19 for the pills that go out of New Castle to  
20 Regulatory Affairs?

21 MR. COLLINS: Objection. Argumentative.

22 THE WITNESS: No.

23 BY MR. BOGLE:

24 Q Okay. Because that's -- it's your job,



1 right?

2 MR. COLLINS: Objection.

3 THE WITNESS: What's my job, please?

4 I'm not sure --

5 BY MR. BOGLE:

6 Q To know what's leaving your facility and  
7 to whom it's going to and whether they can be  
8 trusted.

9 A I didn't --

10 MR. COLLINS: Objection. The question  
11 is compound, it's vague, calls for a legal  
12 conclusion, lacks foundation.

13 BY MR. BOGLE:

14 Q I think it's a good question, so go  
15 ahead.

16 MR. COLLINS: My objections stand.

17 THE WITNESS: I stand by my record and  
18 what I do at the facility.

19 BY MR. BOGLE:

20 Q That's -- that's not my question, sir.

21 A That's the best I can answer.

22 Q My question is, is it your testimony  
23 that your responsibilities as director of  
24 operations at New Castle does not include knowing





[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7           Q     Okay. I'm going to hand you what I'm  
8     marking as Exhibit 1.1794, also marked as  
9     Exhibit 22.

10                     (Snider Exhibit No. 22 was marked  
11                     for identification.)

12     BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The bars are gray, and the background is white. The chart is enclosed in a thin black border.

Category	Percentage
1	85%
2	95%
3	25%
4	80%
5	95%
6	65%
7	95%
8	25%
9	15%
10	100%
11	85%
12	95%
13	65%
14	95%
15	80%
16	90%
17	15%
18	90%
19	95%
20	85%
21	40%
22	55%
23	15%
24	35%

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

[illegible]



1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			
33			
34			
35			
36			
37			
38			
39			
40			
41			
42			
43			
44			
45			
46			
47			
48			
49			
50			
51			
52			
53			
54			
55			
56			
57			
58			
59			
60			
61			
62			
63			
64			
65			
66			
67			
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			
78			
79			
80			
81			
82			
83			
84			
85			
86			
87			
88			
89			
90			
91			
92			
93			
94			
95			
96			
97			
98			
99			
100			

A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing different percentages. The bars are gray, and the background is white. The chart is enclosed in a thin black border.

Category	Percentage
1	25%
2	75%
3	25%
4	10%
5	70%
6	45%
7	10%
8	10%
9	85%
10	90%
11	60%
12	10%
13	65%
14	10%
15	80%
16	70%
17	25%
18	25%
19	85%
20	90%
21	60%
22	70%
23	10%

[illegible]

A horizontal bar chart titled 'Who is responsible for the crisis in Ukraine?' showing the percentage of respondents who believe the current government is responsible. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The data is as follows:

Age Group	Gender	Percentage
18-29	Male	45%
	Female	40%
30-49	Male	55%
	Female	50%
50-69	Male	60%
	Female	55%
70+	Male	65%
	Female	60%

[illegible]

The diagram consists of 20 horizontal gray bars arranged vertically. The bars vary in their starting and ending horizontal positions, creating a staggered sequence. The bars are as follows:

- Bar 1: Starts at the left edge, ends at approximately 80% width.
- Bar 2: Starts at the left edge, ends at approximately 45% width.
- Bar 3: Starts at approximately 15% width, ends at the right edge.
- Bar 4: Starts at the left edge, ends at approximately 35% width.
- Bar 5: Starts at approximately 15% width, ends at approximately 85% width.
- Bar 6: Starts at the left edge, ends at approximately 60% width.
- Bar 7: Starts at approximately 65% width, ends at approximately 85% width.
- Bar 8: Starts at the left edge, ends at approximately 25% width.
- Bar 9: Starts at approximately 15% width, ends at approximately 65% width.
- Bar 10: Starts at approximately 15% width, ends at approximately 35% width.
- Bar 11: Starts at approximately 15% width, ends at approximately 90% width.
- Bar 12: Starts at the left edge, ends at approximately 90% width.
- Bar 13: Starts at the left edge, ends at approximately 90% width.
- Bar 14: Starts at approximately 15% width, ends at the right edge.
- Bar 15: Starts at the left edge, ends at approximately 65% width.
- Bar 16: Starts at approximately 15% width, ends at approximately 85% width.
- Bar 17: Starts at approximately 15% width, ends at approximately 85% width.
- Bar 18: Starts at approximately 25% width, ends at approximately 65% width.
- Bar 19: Starts at the left edge, ends at approximately 40% width.
- Bar 20: Starts at the left edge, ends at approximately 30% width.

[illegible]

[illegible]



[illegible]

[illegible]

[illegible]



[illegible]

[illegible]







[illegible]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Response	Percentage
Yes	85%
No	10%
Don't know	5%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[illegible]

\_\_\_\_\_

\_\_\_\_\_

© 2005 Blackwell Publishing Ltd, *Journal of Internal Medicine* 258: 103–111

\_\_\_\_\_

© 2004 Blackwell Publishing Ltd, *Journal of Internal Medicine* 255: 101–108

\_\_\_\_\_

\_\_\_\_\_

[illegible]



[illegible]

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

[illegible]

■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■		[REDACTED]	
■		[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■		

A horizontal bar chart with 20 rows. Each row has a small square marker on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are gray. The labels are: 1. Very satisfied, 2. Satisfied, 3. Dissatisfied, 4. Very dissatisfied, 5. Don't know, 6. Very satisfied, 7. Satisfied, 8. Dissatisfied, 9. Very dissatisfied, 10. Don't know, 11. Very satisfied, 12. Satisfied, 13. Dissatisfied, 14. Very dissatisfied, 15. Don't know, 16. Very satisfied, 17. Satisfied, 18. Dissatisfied, 19. Very dissatisfied, 20. Don't know. The bars represent the percentage of respondents for each category.

Category	Percentage
Very satisfied	35%
Satisfied	65%
Dissatisfied	85%
Very dissatisfied	80%
Don't know	15%
Very satisfied	95%
Satisfied	30%
Dissatisfied	92%
Very dissatisfied	88%
Don't know	12%
Very satisfied	85%
Satisfied	80%
Dissatisfied	85%
Very dissatisfied	85%
Don't know	15%
Very satisfied	85%
Satisfied	85%
Dissatisfied	85%
Very dissatisfied	85%
Don't know	15%
Very satisfied	85%



Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■	■	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	
■	[REDACTED]		

[illegible]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]	[REDACTED]	
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■	[REDACTED]	[REDACTED]	
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]	[REDACTED]	
■		■	[REDACTED]
■		[REDACTED]	[REDACTED]

[REDACTED]

19 (Snider Exhibit No. 30 was marked  
20 for identification.)

21 BY MR. BOGLE:

22 Q Okay. I'm going to hand you what's  
23 marked as Exhibit 30, 1.1905.

24 Do you see it's another DOJ press

1 release from November 2nd, 2018, just a few days  
2 ago. And the title is "Johnstown pharmacist  
3 charged with -- charged in 109-count indictment  
4 with illegally creating bogus prescriptions and  
5 then dispensing the drugs."

6 Do you see that title?

7 A Yes, I do.

8 Q Okay. Thereafter it says: "A  
9 Johnstown, PA, pharmacist has been indicted by a  
10 federal grand jury in Pittsburgh on charges of  
11 dispensing and distributing controlled substances  
12 and conspiring to distribute and dispense  
13 controlled substances, by United States Attorney  
14 Scott W. Brady announced today."

15 Then it says: "The 109-count indictment  
16 returned on October 30th named Joseph M. Martella,  
17 53, of Johnstown, Pennsylvania."

18 Then it says: "According to the  
19 indictment presented to the court, Martella owned  
20 and operated Martella's Pharmacy located on  
21 Franklin Street in Johnstown. The indictment  
22 alleges that Martella, a pharmacist, conspired  
23 with Dr. Peter James Ridella, who previously  
24 pleaded guilty, and with an individual known as JR

1 to create and submit unlawful prescriptions for  
2 oxycodone; oxycodone and acetaminophen, also known  
3 as Percocet; oxymorphone, also known as Opana;  
4 morphine sulfate, also known MS Contin; and  
5 hydrocodone and acetaminophen, also known as  
6 Vicodin, and then unlawfully dispensed those  
7 controlled substances to other persons."

8 Do you see that?

9           A     I see that, yeah.

U.S. should...	Percentage
Take action to address climate change	85%
Reduce greenhouse gas emissions	83%
Invest in clean energy research and development	79%
Protect natural resources	71%
Hold corporations and individuals accountable for their carbon footprint	68%
Support international climate agreements	65%
Encourage sustainable consumption	62%
Improve energy efficiency	59%
Support renewable energy sources	56%
Reduce meat consumption	53%
Reduce air travel	50%
Reduce car use	47%
Reduce energy use	44%
Reduce water use	41%
Reduce waste	38%
Reduce meat consumption	35%
Reduce air travel	32%
Reduce car use	29%
Reduce energy use	26%
Reduce water use	23%
Reduce waste	20%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Okay.

9 (Snider Exhibit No. 31 was marked  
10 for identification.)

11 BY MR. BOGLE:

12 Q I'm handing you Exhibit 31 to your  
13 deposition, 1.1904.

14 This is the actual indictment for  
15 Martella's. And if you look to the point I just  
16 asked you about the covered period for this  
17 conduct, on page 10, do you see the paragraph  
18 starts there "From in and around"?

19 MR. COLLINS: I'm sorry. Can I have a  
20 proffer as to the relevance of this? It certainly  
21 doesn't involve Summit County, it doesn't involve  
22 Cuyahoga County, it doesn't involve the cities of  
23 Cleveland or Canton. Can I have a proffer as to  
24 the relevance?

1 MR. BOGLE: No.

2 MR. COLLINS: Okay.

3 MR. BOGLE: You're entitled to nothing  
4 of the sort.

5 MR. COLLINS: Okay. Well --

6 BY MR. BOGLE:

7 Q "From in and around April 2011 and  
8 continuing thereafter to in and around June 2016  
9 in the Western District of Pennsylvania, the  
10 Defendant Joseph M. Martella," and it goes on to  
11 repeat sort of the allegations I talked about as  
12 far as the diversion of controlled substances,  
13 including opioids.

14 Do you see that?

15 A Yes, I see it.

[REDACTED]





■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
■	[REDACTED]	[REDACTED]	
■		[REDACTED]	[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	
■	[REDACTED]	[REDACTED]	
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]
■		[REDACTED]	[REDACTED]

[illegible]

18 MR. COLLINS: What's the question?

19 BY MR. BOGLE:

20 Q Do you see that?

21 MR. COLLINS: I'm sorry. That's not a  
22 proper question. You need to ask a legitimate,  
23 proper question.

24 MR. BOGLE: No, I'm good with that one.

1 BY MR. BOGLE:

2 Q Do you see that?

3 MR. COLLINS: See what?

4 BY MR. BOGLE:

5 Q See that in the indictment? The covered  
6 period was just a few months after the threshold  
7 that you said you upped.

8 MR. COLLINS: Objection.  
9 Mischaracterization.

10 BY MR. BOGLE:

11 Q For hydrocodone and methadone for this  
12 pharmacy.

13 MR. COLLINS: Objection. The question  
14 is compound. It's also argumentative.

15 THE WITNESS: I see what it says now.

16 MR. BOGLE: I'm moving to a whole other  
17 topic area. If we can take a break, and we'll  
18 reload documents.

19 THE VIDEOGRAPHER: The time is 2:47 p.m.  
20 We're going off the record.

21 (Recess.)

22 THE VIDEOGRAPHER: The time is 3:03 p.m.  
23 We're back on the record.

24 BY MR. BOGLE:

1           Q     All right. Mr. Snider, I want to shift  
2     gears to a different topic area.

3                     We talked about earlier that Ohio was  
4     one of the states that customers -- that your New  
5     Castle Distribution Center services, right?

6           A     Yes.

7           Q     And you know that Ohio in recent years  
8     has had a high level of abuse and diversion of  
9     opioids within that state, right?

10                    MR. COLLINS: Objection. Form.  
11     Foundation.

12                    THE WITNESS: I know it's in the papers,  
13     yes.

14     BY MR. BOGLE:

15           Q     Okay. And you've read those stats,  
16     right?

17           A     Yes.

18           Q     On that topic.

19                    MR. COLLINS: Objection. Form.

20                    THE WITNESS: Yeah.

21     BY MR. BOGLE:

22           Q     Okay. I want to hand you what I'm  
23     marking as Exhibit 1.1434, so Exhibit 32.

24                    (Snider Exhibit No. 32 was marked

1 for identification.)

2 BY MR. BOGLE:

█ █ [REDACTED]

█ [REDACTED] █

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED] █ [REDACTED]

█ [REDACTED]

█ █ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ █ [REDACTED]

█ █ [REDACTED]

█ [REDACTED]

█ █ [REDACTED]

18 Q Okay. So that's a meeting you would

19 have attended, right?

20 A What year is it?

21 MR. COLLINS: Objection.

22 BY MR. BOGLE:

23 Q 2014.

24 MR. COLLINS: Objection. Form.

1 THE WITNESS: I don't know if I attended  
2 that one.

3 BY MR. BOGLE:

4 Q Okay. Is that a meeting you generally  
5 would attend?

6 A Normally, I do. I'm not sure, in 2014,  
7 I was exempted because I believe I was -- that's  
8 when I was putting up a new distribution center in  
9 Delran.

10 Q Okay. Would you have -- if you did not  
11 attend this specific session, would you generally  
12 have requested the materials that were passed  
13 out --

14 MR. COLLINS: Objection.

15 BY MR. BOGLE:

16 Q -- so you could catch up to speed?

17 MR. COLLINS: Objection. Form.

18 THE WITNESS: I certainly would think  
19 so, yes.

20 BY MR. BOGLE:

21 Q Okay. So I want to look at the -- just  
22 one slide from this PowerPoint deck that was  
23 presented in 2014. If you go to page .13.

24 Do you see there is a slide titled

[illegible]



[illegible]

[illegible]

Category	Percentage
1	99%
2	98%
3	97%
4	96%
5	95%
6	94%
7	93%
8	92%
9	91%
10	90%
11	89%
12	88%
13	87%
14	86%
15	85%
16	84%
17	83%
18	82%
19	81%
20	80%
21	79%
22	78%
23	77%
24	76%
25	75%
26	74%
27	73%
28	72%
29	71%
30	70%
31	69%
32	68%
33	67%
34	66%
35	65%
36	64%
37	63%
38	62%
39	61%
40	60%
41	59%
42	58%
43	57%
44	56%
45	55%
46	54%
47	53%
48	52%
49	51%
50	50%
51	49%
52	48%
53	47%
54	46%
55	45%
56	44%
57	43%
58	42%
59	41%
60	40%
61	39%
62	38%
63	37%
64	36%
65	35%
66	34%
67	33%
68	32%
69	31%
70	30%
71	29%
72	28%
73	27%
74	26%
75	25%
76	24%
77	23%
78	22%
79	21%
80	20%
81	19%
82	18%
83	17%
84	16%
85	15%
86	14%
87	13%
88	12%
89	11%
90	10%
91	9%
92	8%
93	7%
94	6%
95	5%
96	4%
97	3%
98	2%
99	1%

[illegible]

[illegible]

[illegible]

1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
37	38	39
40	41	42
43	44	45
46	47	48
49	50	51
52	53	54
55	56	57
58	59	60
61	62	63
64	65	66
67	68	69
70	71	72
73	74	75
76	77	78
79	80	81
82	83	84
85	86	87
88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

[illegible]



1           A       Yes.

2           Q       Okay. So does this jog your memory at  
3 all about any discussions about Summit Pain  
4 Specialists?

5           A       No. I don't even know if we put them on  
6 as a customer, and I don't know Kim Diemand or  
7 Steve Kravec was a sales exec. I don't really  
8 know him very well.

9           Q       Okay. And you said Acme Pharmacy  
10 doesn't ring a bell for you either, huh?

11          A       No, I'm sorry.

12          Q       Okay.

13          A       We don't have them now, I know that.

14          Q       I agree with that.

15                   (Snider Exhibit No. 35 was marked  
16 for identification.)

17 BY MR. BOGLE:

18          Q       Well, let's take a look then at the next  
19 exhibit, 1.1870, which is also Exhibit 35.

20                   MR. COLLINS: What number?

21                   MR. BOGLE: Exhibit 35.

22                   MR. COLLINS: Thank you.

23 BY MR. BOGLE:

24          Q       Okay. And you see this is an e-mail

[illegible]

[illegible]

[illegible]

[illegible]

■	[REDACTED]
■	■ [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
■	■ [REDACTED] [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED] [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED]



1           Q     Okay. Well, if you go back to  
2     Exhibit 1.1568, which is Exhibit 9. Keep that one  
3     out there with the 70,000 doses.

4           A     That what, keep --

5           Q     Keep that next to you, but I want you to  
6     pull this one out too, Exhibit 9.

7           A     Nine?

8           Q     Yeah.

9                     MR. COLLINS: I think they should be in  
10    order.

11                    THE WITNESS: Well, kind of.

12                    MR. COLLINS: Let me get mine.

13    BY MR. BOGLE:

14           Q     You got Exhibit 9?

15           A     Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Okay. And you understand that when you  
9 get copied on something, you get included on the  
10 whole -- you get to see the whole chain before it,  
11 right?

12 MR. COLLINS: Objection to the form.

13 BY MR. BOGLE:

14 Q That's how e-mails work, right?

15 A I do know how e-mails work --

16 Q Right.

17 A -- but I don't remember this e-mail  
18 ever.

19 Q Okay. That's fair.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



1 THE WITNESS: I'll testify that I don't  
2 remember reading it. I don't even remember the  
3 Acme.

4 BY MR. BOGLE:

5 Q Do you typically not read e-mails  
6 you're -- you're copied on?

7 MR. COLLINS: Objection. Argumentative.

8 THE WITNESS: I can't say typically.

9 BY MR. BOGLE:

[REDACTED]

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not sure	100%
7. Don't know	100%
8. No answer	100%
9. No opinion	100%
10. No response	100%
11. No data	100%
12. No information	100%
13. No knowledge	100%
14. No experience	100%
15. No contact	100%
16. No relationship	100%
17. No connection	100%
18. No link	100%
19. No association	100%
20. No correlation	100%
21. No comparison	100%
22. No contrast	100%
23. No difference	100%
24. No similarity	100%
25. No contrast	100%
26. No difference	100%
27. No similarity	100%
28. No contrast	100%
29. No difference	100%
30. No similarity	100%
31. No contrast	100%
32. No difference	100%
33. No similarity	100%
34. No contrast	100%
35. No difference	100%
36. No similarity	100%
37. No contrast	100%
38. No difference	100%
39. No similarity	100%
40. No contrast	100%
41. No difference	100%
42. No similarity	100%
43. No contrast	100%
44. No difference	100%
45. No similarity	100%
46. No contrast	100%
47. No difference	100%
48. No similarity	100%
49. No contrast	100%
50. No difference	100%
51. No similarity	100%
52. No contrast	100%
53. No difference	100%
54. No similarity	100%
55. No contrast	100%
56. No difference	100%
57. No similarity	100%
58. No contrast	100%
59. No difference	100%
60. No similarity	100%
61. No contrast	100%
62. No difference	100%
63. No similarity	100%
64. No contrast	100%
65. No difference	100%
66. No similarity	100%
67. No contrast	100%
68. No difference	100%
69. No similarity	100%
70. No contrast	100%
71. No difference	100%
72. No similarity	100%
73. No contrast	100%
74. No difference	100%
75. No similarity	100%
76. No contrast	100%
77. No difference	100%
78. No similarity	100%
79. No contrast	100%
80. No difference	100%
81. No similarity	100%
82. No contrast	100%
83. No difference	100%
84. No similarity	100%
85. No contrast	100%
86. No difference	100%
87. No similarity	100%
88. No contrast	100%
89. No difference	100%
90. No similarity	100%
91. No contrast	100%
92. No difference	100%
93. No similarity	100%
94. No contrast	100%
95. No difference	100%
96. No similarity	100%
97. No contrast	100%
98. No difference	100%
99. No similarity	100%
100. No contrast	100%

[illegible]

[illegible]

1	[REDACTED]		
2	[REDACTED]	[REDACTED]	
3	[REDACTED]		
4		[REDACTED]	
5	[REDACTED]		
6	[REDACTED]	[REDACTED]	
7		[REDACTED]	[REDACTED]
8		[REDACTED]	[REDACTED]
9	[REDACTED]		
10	[REDACTED]		
11		[REDACTED]	[REDACTED]
12	[REDACTED]		
13		[REDACTED]	
14		[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]	
16	[REDACTED]	[REDACTED]	
17	[REDACTED]	[REDACTED]	
18	[REDACTED]	[REDACTED]	
19	[REDACTED]	[REDACTED]	
20	[REDACTED]	[REDACTED]	
21	[REDACTED]	[REDACTED]	
22	[REDACTED]	[REDACTED]	
23	[REDACTED]	[REDACTED]	
24	[REDACTED]	[REDACTED]	
25	[REDACTED]	[REDACTED]	
26	[REDACTED]	[REDACTED]	
27	[REDACTED]	[REDACTED]	
28	[REDACTED]	[REDACTED]	
29	[REDACTED]	[REDACTED]	
30	[REDACTED]	[REDACTED]	
31	[REDACTED]	[REDACTED]	
32	[REDACTED]	[REDACTED]	
33	[REDACTED]	[REDACTED]	
34	[REDACTED]	[REDACTED]	
35	[REDACTED]	[REDACTED]	
36	[REDACTED]	[REDACTED]	
37	[REDACTED]	[REDACTED]	
38	[REDACTED]	[REDACTED]	
39	[REDACTED]	[REDACTED]	
40	[REDACTED]	[REDACTED]	
41	[REDACTED]	[REDACTED]	
42	[REDACTED]	[REDACTED]	
43	[REDACTED]	[REDACTED]	
44	[REDACTED]	[REDACTED]	
45	[REDACTED]	[REDACTED]	
46	[REDACTED]	[REDACTED]	
47	[REDACTED]	[REDACTED]	
48	[REDACTED]	[REDACTED]	
49	[REDACTED]	[REDACTED]	
50	[REDACTED]	[REDACTED]	
51	[REDACTED]	[REDACTED]	
52	[REDACTED]	[REDACTED]	
53	[REDACTED]	[REDACTED]	
54	[REDACTED]	[REDACTED]	
55	[REDACTED]	[REDACTED]	
56	[REDACTED]	[REDACTED]	
57	[REDACTED]	[REDACTED]	
58	[REDACTED]	[REDACTED]	
59	[REDACTED]	[REDACTED]	
60	[REDACTED]	[REDACTED]	
61	[REDACTED]	[REDACTED]	
62	[REDACTED]	[REDACTED]	
63	[REDACTED]	[REDACTED]	
64	[REDACTED]	[REDACTED]	
65	[REDACTED]	[REDACTED]	
66	[REDACTED]	[REDACTED]	
67	[REDACTED]	[REDACTED]	
68	[REDACTED]	[REDACTED]	
69	[REDACTED]	[REDACTED]	
70	[REDACTED]	[REDACTED]	
71	[REDACTED]	[REDACTED]	
72	[REDACTED]	[REDACTED]	
73	[REDACTED]	[REDACTED]	
74	[REDACTED]	[REDACTED]	
75	[REDACTED]	[REDACTED]	
76	[REDACTED]	[REDACTED]	
77	[REDACTED]	[REDACTED]	
78	[REDACTED]	[REDACTED]	
79	[REDACTED]	[REDACTED]	
80	[REDACTED]	[REDACTED]	
81	[REDACTED]	[REDACTED]	
82	[REDACTED]	[REDACTED]	
83	[REDACTED]	[REDACTED]	
84	[REDACTED]	[REDACTED]	
85	[REDACTED]	[REDACTED]	
86	[REDACTED]	[REDACTED]	
87	[REDACTED]	[REDACTED]	
88	[REDACTED]	[REDACTED]	
89	[REDACTED]	[REDACTED]	
90	[REDACTED]	[REDACTED]	
91	[REDACTED]	[REDACTED]	
92	[REDACTED]	[REDACTED]	
93	[REDACTED]	[REDACTED]	
94	[REDACTED]	[REDACTED]	
95	[REDACTED]	[REDACTED]	
96	[REDACTED]	[REDACTED]	
97	[REDACTED]	[REDACTED]	
98	[REDACTED]	[REDACTED]	
99	[REDACTED]	[REDACTED]	
100	[REDACTED]	[REDACTED]	



Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not sure	100%
7. Don't know	100%
8. No answer	100%
9. Other	100%
10. No opinion	100%
11. No response	100%
12. No data	100%
13. No information	100%
14. No knowledge	100%
15. No experience	100%
16. No contact	100%
17. No communication	100%
18. No interaction	100%
19. No participation	100%
20. No involvement	100%
21. No contribution	100%
22. No input	100%
23. No output	100%
24. No result	100%
25. No effect	100%
26. No impact	100%
27. No change	100%
28. No difference	100%
29. No improvement	100%
30. No progress	100%
31. No success	100%
32. No achievement	100%
33. No accomplishment	100%
34. No completion	100%
35. No finish	100%
36. No end	100%
37. No conclusion	100%
38. No decision	100%
39. No action	100%
40. No response	100%
41. No reaction	100%
42. No movement	100%
43. No action	100%
44. No response	100%
45. No reaction	100%
46. No movement	100%
47. No action	100%
48. No response	100%
49. No reaction	100%
50. No movement	100%





1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
37	38	39
40	41	42
43	44	45
46	47	48
49	50	51
52	53	54
55	56	57
58	59	60
61	62	63
64	65	66
67	68	69
70	71	72
73	74	75
76	77	78
79	80	81
82	83	84
85	86	87
88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Sir, this was provided to us. I can  
9 tell you -- if it's wrong, I guarantee you your  
10 counsel will establish it's wrong. It ain't  
11 wrong. Okay?

12 This is Acme Pharmacy. This was  
13 provided to us from your counsel coming from  
14 McKesson's files.

15 A I'm --

16 MR. COLLINS: Objection.

17 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Category	Percentage
1. No answer	0%
2. Not applicable	0%
3. Not applicable	0%
4. Not applicable	0%
5. Not applicable	0%
6. Not applicable	0%
7. Not applicable	0%
8. Not applicable	0%
9. Not applicable	0%
10. Not applicable	0%
11. Not applicable	0%
12. Not applicable	0%
13. Not applicable	0%
14. Not applicable	0%
15. Not applicable	0%
16. Not applicable	0%
17. Not applicable	0%
18. Not applicable	0%
19. Not applicable	0%
20. Not applicable	0%
21. Not applicable	0%
22. Not applicable	0%
23. Not applicable	0%
24. Not applicable	0%
25. Not applicable	0%
26. Not applicable	0%
27. Not applicable	0%
28. Not applicable	0%
29. Not applicable	0%
30. Not applicable	0%
31. Not applicable	0%
32. Not applicable	0%
33. Not applicable	0%
34. Not applicable	0%
35. Not applicable	0%
36. Not applicable	0%
37. Not applicable	0%
38. Not applicable	0%
39. Not applicable	0%
40. Not applicable	0%
41. Not applicable	0%
42. Not applicable	0%
43. Not applicable	0%
44. Not applicable	0%
45. Not applicable	0%
46. Not applicable	0%
47. Not applicable	0%
48. Not applicable	0%
49. Not applicable	0%
50. Not applicable	0%
51. Not applicable	0%
52. Not applicable	0%
53. Not applicable	0%
54. Not applicable	0%
55. Not applicable	0%
56. Not applicable	0%
57. Not applicable	0%
58. Not applicable	0%
59. Not applicable	0%
60. Not applicable	0%
61. Not applicable	0%
62. Not applicable	0%
63. Not applicable	0%
64. Not applicable	0%
65. Not applicable	0%
66. Not applicable	0%
67. Not applicable	0%
68. Not applicable	0%
69. Not applicable	0%
70. Not applicable	0%
71. Not applicable	0%
72. Not applicable	0%
73. Not applicable	0%
74. Not applicable	0%
75. Not applicable	0%
76. Not applicable	0%
77. Not applicable	0%
78. Not applicable	0%
79. Not applicable	0%
80. Not applicable	0%
81. Not applicable	0%
82. Not applicable	0%
83. Not applicable	0%
84. Not applicable	0%
85. Not applicable	0%
86. Not applicable	0%
87. Not applicable	0%
88. Not applicable	0%
89. Not applicable	0%
90. Not applicable	0%
91. Not applicable	0%
92. Not applicable	0%
93. Not applicable	0%
94. Not applicable	0%
95. Not applicable	0%
96. Not applicable	0%
97. Not applicable	0%
98. Not applicable	0%
99. Not applicable	0%
100. Not applicable	0%

[illegible]

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not sure	100%
7. Don't know	100%
8. No answer	100%
9. No opinion	100%
10. No response	100%
11. No data	100%
12. No information	100%
13. No knowledge	100%
14. No experience	100%
15. No contact	100%
16. No interaction	100%
17. No communication	100%
18. No connection	100%
19. No relationship	100%
20. No association	100%
21. No link	100%
22. No tie	100%
23. No bond	100%
24. No纽带	100%
25. No纽带	100%
26. No纽带	100%
27. No纽带	100%
28. No纽带	100%
29. No纽带	100%
30. No纽带	100%
31. No纽带	100%
32. No纽带	100%
33. No纽带	100%
34. No纽带	100%
35. No纽带	100%
36. No纽带	100%
37. No纽带	100%
38. No纽带	100%
39. No纽带	100%
40. No纽带	100%
41. No纽带	100%
42. No纽带	100%
43. No纽带	100%
44. No纽带	100%
45. No纽带	100%
46. No纽带	100%
47. No纽带	100%
48. No纽带	100%
49. No纽带	100%
50. No纽带	100%
51. No纽带	100%
52. No纽带	100%
53. No纽带	100%
54. No纽带	100%
55. No纽带	100%
56. No纽带	100%
57. No纽带	100%
58. No纽带	100%
59. No纽带	100%
60. No纽带	100%
61. No纽带	100%
62. No纽带	100%
63. No纽带	100%
64. No纽带	100%
65. No纽带	100%
66. No纽带	100%
67. No纽带	100%
68. No纽带	100%
69. No纽带	100%
70. No纽带	100%
71. No纽带	100%
72. No纽带	100%
73. No纽带	100%
74. No纽带	100%
75. No纽带	100%
76. No纽带	100%
77. No纽带	100%
78. No纽带	100%
79. No纽带	100%
80. No纽带	100%
81. No纽带	100%
82. No纽带	100%
83. No纽带	100%
84. No纽带	100%
85. No纽带	100%
86. No纽带	100%
87. No纽带	100%
88. No纽带	100%
89. No纽带	100%
90. No纽带	100%
91. No纽带	100%
92. No纽带	100%
93. No纽带	100%
94. No纽带	100%
95. No纽带	100%
96. No纽带	100%
97. No纽带	100%
98. No纽带	100%
99. No纽带	100%
100. No纽带	100%



[illegible]



[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Not aware of that?

9 I hand you what I'm marking Exhibit 39,  
10 Exhibit 1.1895.

11 (Snider Exhibit No. 39 was marked  
12 for identification.)

13 BY MR. BOGLE:

14 Q This is an article from the Akron Beacon  
15 Journal/Ohio.com titled "Stow Pain Clinic closing  
16 after court upholds sexual imposition conviction  
17 against doctor accused of abusing patients,"  
18 posted August 11, 2016. Do you see that?

19 A I see that, yes.

20 Q Okay. The first sentence says: "Summit  
21 Pain Specialists in Stow is permanently closed  
22 Monday after years of wrangling over a sex abuse  
23 scandal involving a doctor there."

24 Do you see that?

1           A       I see that, yes.

2           Q       The third paragraph there says: "But  
3   the Ohio Supreme Court on August 3 upheld the  
4   Summit County Common Pleas Court conviction a  
5   former doctor James Bressi, who once co-owned the  
6   business with former doctor Robert Stephen  
7   Geiger."

8                   Do you see that?

9           A       No. Can you tell me where you are?  
10   I -- I was under what prompted the clinic to  
11   close.

12          Q       Right here, sir, if you look at my  
13   finger.

14          A       I'm sorry. You skipped around. I  
15   didn't see that.

16          Q       You want me to reread that for you?

17          A       Please.

18          Q       So you can follow along.

19          A       Please.

20          Q       That's fair.

21                   The portion I read says: "But the Ohio  
22   Supreme Court on August 3 upheld the Summit County  
23   Common Please Court conviction of former  
24   doctor James Bressi, who once co-owned the



■ ■ ■

2 Q Okay. Do you have any reason to dispute  
3 that pretty quickly after Summit Pain Specialists  
4 closed so did Acme 30?

5 MR. COLLINS: Objection. Foundation,  
6 form.

7 THE WITNESS: I do not know or remember  
8 any of that. I'm sorry.

9 BY MR. BOGLE:

10 Q Okay. Well, let's just close the loop  
11 here.

12 (Snider Exhibit No. 40 was marked  
13 for identification.)

14 BY MR. BOGLE:

15 Q Exhibit 40, 1.1911. I pulled this off  
16 of Google before I came, pertaining to Acme  
17 Pharmacy in Stow, Ohio. Same address as we just  
18 saw in the investigative report.

19 Do you see it's noted to be permanently  
20 closed?

21 MR. COLLINS: Objection. Foundation.

22 THE WITNESS: If you say -- I don't see  
23 where it says that. Please point to it.

24 Permanently closed, yes.

1 BY MR. BOGLE:

2 Q Okay. But again, this is not a customer  
3 you ever even recall dealing with at all, right?

4 A I don't think I was in New Castle at the  
5 time. I was in Delran, New Jersey.

6 Q You weren't in New Castle at all from  
7 when you -- this account started getting serviced  
8 in 2012 to 2016 when that -- it closed?

9 A I was there in 2012, yes.

10 Q Okay. For what period of time were you  
11 not at New Castle then?

12 A '14 and '15 or '15, '16. I don't  
13 remember.

14 Q Who was running New Castle while you  
15 were gone?

16 A Andrew Moore, the VP/GM.

17 Q Andrew Moore?

18 A Yes.

19 Q Okay. Did you have any communications  
20 concerning New Castle during that time period that  
21 you were in Delran?

22 A Not too many.

23 Q Okay. There are many Giant Eagle  
24 Pharmacies that -- in Summit and Cuyahoga County





[illegible]

[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	



A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The categories are not explicitly labeled, but the bars represent data points for each category.

Category	Percentage
1	65%
2	35%
3	85%
4	25%
5	45%
6	15%
7	10%
8	90%
9	75%
10	85%
11	65%
12	15%
13	10%
14	90%
15	85%
16	55%
17	65%
18	90%
19	25%
20	35%

Category	Percentage
1. Very satisfied	100%
2. Satisfied	100%
3. Dissatisfied	100%
4. Very dissatisfied	100%
5. Don't know	100%
6. Very satisfied	100%
7. Satisfied	100%
8. Dissatisfied	100%
9. Very dissatisfied	100%
10. Don't know	100%
11. Very satisfied	100%
12. Satisfied	100%
13. Dissatisfied	100%
14. Very dissatisfied	100%
15. Don't know	100%
16. Very satisfied	100%
17. Satisfied	100%
18. Dissatisfied	100%
19. Very dissatisfied	100%
20. Don't know	100%
21. Very satisfied	100%
22. Satisfied	100%
23. Dissatisfied	100%
24. Very dissatisfied	100%
25. Don't know	100%
26. Very satisfied	100%
27. Satisfied	100%
28. Dissatisfied	100%
29. Very dissatisfied	100%
30. Don't know	100%
31. Very satisfied	100%
32. Satisfied	100%
33. Dissatisfied	100%
34. Very dissatisfied	100%
35. Don't know	100%
36. Very satisfied	100%
37. Satisfied	100%
38. Dissatisfied	100%
39. Very dissatisfied	100%
40. Don't know	100%
41. Very satisfied	100%
42. Satisfied	100%
43. Dissatisfied	100%
44. Very dissatisfied	100%
45. Don't know	100%
46. Very satisfied	100%
47. Satisfied	100%
48. Dissatisfied	100%
49. Very dissatisfied	100%
50. Don't know	100%
51. Very satisfied	100%
52. Satisfied	100%
53. Dissatisfied	100%
54. Very dissatisfied	100%
55. Don't know	100%
56. Very satisfied	100%
57. Satisfied	100%
58. Dissatisfied	100%
59. Very dissatisfied	100%
60. Don't know	100%
61. Very satisfied	100%
62. Satisfied	100%
63. Dissatisfied	100%
64. Very dissatisfied	100%
65. Don't know	100%
66. Very satisfied	100%
67. Satisfied	100%
68. Dissatisfied	100%
69. Very dissatisfied	100%
70. Don't know	100%
71. Very satisfied	100%
72. Satisfied	100%
73. Dissatisfied	100%
74. Very dissatisfied	100%
75. Don't know	100%
76. Very satisfied	100%
77. Satisfied	100%
78. Dissatisfied	100%
79. Very dissatisfied	100%
80. Don't know	100%
81. Very satisfied	100%
82. Satisfied	100%
83. Dissatisfied	100%
84. Very dissatisfied	100%
85. Don't know	100%
86. Very satisfied	100%
87. Satisfied	100%
88. Dissatisfied	100%
89. Very dissatisfied	100%
90. Don't know	100%
91. Very satisfied	100%
92. Satisfied	100%
93. Dissatisfied	100%
94. Very dissatisfied	100%
95. Don't know	100%
96. Very satisfied	100%
97. Satisfied	100%
98. Dissatisfied	100%
99. Very dissatisfied	100%
100. Don't know	100%

A horizontal bar chart comparing the percentage of respondents reporting different types of violence against women, categorized by gender (Male and Female). The Y-axis lists 20 types of violence, and the X-axis shows percentages from 0% to 100% in 10% increments. For each category, there are two bars: a light blue bar for 'Male' and a dark blue bar for 'Female'. The data is as follows:

Type of Violence	Male (%)	Female (%)
Physical violence	40	40
Sexual violence	20	20
Psychological violence	70	70
Economic violence	20	20
Stalking	10	80
Harassment	90	90
Intimidation	90	90
Verbal abuse	10	10
Isolation	10	20
Sexual harassment	80	80
Physical harassment	20	20
Sexual assault	20	20
Physical assault	70	70
Sexual violence	20	20
Psychological violence	80	80
Economic violence	20	20
Stalking	10	80
Harassment	90	90
Intimidation	90	90
Verbal abuse	10	10
Isolation	10	20
Sexual harassment	80	80
Physical harassment	20	20
Sexual assault	20	20
Physical assault	70	70
Sexual violence	20	20



[illegible]



[illegible]

A horizontal bar chart titled "U.S. should take action to address climate change" showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 20 different age and gender categories. The x-axis represents the percentage, ranging from 0% to 100%.

Age Group	Gender	Percentage
18-29	Male	95%
18-29	Female	95%
30-49	Male	90%
30-49	Female	95%
50-69	Male	25%
50-69	Female	55%
70+	Male	85%
70+	Female	25%
18-29	Male	55%
18-29	Female	100%
30-49	Male	25%
30-49	Female	100%
50-69	Male	25%
50-69	Female	100%
70+	Male	25%
70+	Female	100%
18-29	Male	100%
18-29	Female	100%
30-49	Male	100%
30-49	Female	100%
50-69	Male	100%
50-69	Female	100%
70+	Male	100%
70+	Female	100%
18-29	Male	100%
18-29	Female	100%
30-49	Male	100%
30-49	Female	100%
50-69	Male	100%
50-69	Female	100%
70+	Male	100%
70+	Female	100%



[REDACTED]

9 Q Okay. All right. We're done with that.

10 MR. COLLINS: When would be a good time  
11 to take a break?

12 MR. BOGLE: It's fine now. Yeah, if he  
13 needs it, that's fine.

14 THE VIDEOGRAPHER: The time is 3:56 p.m.  
15 We're going off the record.

16 (Recess.)

17 THE VIDEOGRAPHER: The time is 4:08 p.m.  
18 We're back on the record.

19 BY MR. BOGLE:

20 Q Okay, Mr. Snider, we had stopped --  
21 broken after talking about some of the Giant Eagle  
22 Pharmacies, and I want to talk about a couple more  
23 of those from Summit and Cuyahoga County.

24 (Snider Exhibit No. 43 was marked

1 for identification.)

2 BY MR. BOGLE:

3 Q I'm going to hand you what's marked as

4 1.1811, Exhibit 43.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]





[illegible]

[illegible]

[illegible]



[illegible]

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not at all	100%
7. Don't know	100%
8. No answer	100%
9. No opinion	100%
10. No response	100%
11. No data	100%
12. No information	100%
13. No access	100%
14. No contact	100%
15. No communication	100%
16. No interaction	100%
17. No participation	100%
18. No involvement	100%
19. No engagement	100%
20. No contribution	100%
21. No input	100%
22. No output	100%
23. No result	100%
24. No achievement	100%
25. No success	100%
26. No failure	100%
27. No loss	100%
28. No gain	100%
29. No benefit	100%
30. No harm	100%
31. No risk	100%
32. No danger	100%
33. No threat	100%
34. No danger	100%
35. No risk	100%
36. No harm	100%
37. No benefit	100%
38. No gain	100%
39. No loss	100%
40. No failure	100%
41. No success	100%
42. No achievement	100%
43. No result	100%
44. No output	100%
45. No input	100%
46. No contribution	100%
47. No engagement	100%
48. No involvement	100%
49. No participation	100%
50. No interaction	100%
51. No communication	100%
52. No contact	100%
53. No access	100%
54. No information	100%
55. No data	100%
56. No response	100%
57. No opinion	100%
58. No answer	100%
59. Don't know	100%
60. Not at all	100%
61. Very low	100%
62. Low	100%
63. Medium	100%
64. High	100%
65. Very high	100%



[illegible]



Horizontal bar chart showing the percentage of respondents for various categories of people who have been in contact with someone who has been infected with COVID-19. The categories are listed on the y-axis, and the percentage of respondents is shown on the x-axis (0 to 100%).

Category	Percentage of Respondents
1. People who have been in contact with someone who has been infected with COVID-19	100%
2. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19	85%
3. People who have been in contact with someone who has been infected with COVID-19 and who have not been infected with COVID-19	15%
4. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	10%
5. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
6. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
7. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
8. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
9. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
10. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
11. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
12. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
13. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
14. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
15. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
16. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
17. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
18. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
19. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%
20. People who have been in contact with someone who has been infected with COVID-19 and who have been infected with COVID-19 and who have not been infected with COVID-19	5%

Category	Percentage
1. Very high	10%
2. High	25%
3. Medium	15%
4. Low	10%
5. Very low	10%
6. Not at all	10%
7. Don't know	10%
8. No answer	10%
9. No opinion	10%
10. No response	10%
11. No data	10%
12. No information	10%
13. No access	10%
14. No contact	10%
15. No communication	10%
16. No interaction	10%
17. No participation	10%
18. No involvement	10%
19. No engagement	10%
20. No contribution	10%
21. No input	10%
22. No output	10%
23. No result	10%
24. No achievement	10%
25. No success	10%
26. No failure	10%
27. No loss	10%
28. No gain	10%
29. No benefit	10%
30. No harm	10%
31. No risk	10%
32. No danger	10%
33. No threat	10%
34. No danger	10%
35. No risk	10%
36. No harm	10%
37. No benefit	10%
38. No gain	10%
39. No loss	10%
40. No failure	10%
41. No success	10%
42. No achievement	10%
43. No result	10%
44. No output	10%
45. No input	10%
46. No contribution	10%
47. No engagement	10%
48. No involvement	10%
49. No participation	10%
50. No interaction	10%
51. No communication	10%
52. No contact	10%
53. No access	10%
54. No information	10%
55. No data	10%
56. No response	10%
57. No opinion	10%
58. No answer	10%
59. Don't know	10%
60. Not at all	10%
61. Very low	10%
62. Low	10%
63. Medium	10%
64. High	10%
65. Very high	10%

[illegible]

[illegible]



[illegible]

[illegible]

[illegible]





[illegible]

■		[REDACTED]
■		[REDACTED]
■		[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■		[REDACTED]
■		[REDACTED]
■		[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]

[illegible]

[illegible]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED] [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ [REDACTED]

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

[illegible]



[illegible]

[illegible]



[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q You do know that McKesson ultimately in  
9 2016 paid a \$150 million fine for violations of  
10 the Controlled Substances Act, right?

11 MR. COLLINS: Objection. Calls for a  
12 legal conclusion.

13 BY MR. BOGLE:

14 Q Do you know whether that occurred?

15 MR. COLLINS: I'm sorry. Lack of  
16 foundation. Form.

17 BY MR. BOGLE:

18 Q Do you know that?

19 A I heard it was a settlement with the  
20 DEA.

21 Q Okay. Do --

22 A And that's what I was told.

23 Q You weren't told how much?

24 A I was told it was --









[illegible]

[illegible]

[illegible]



[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 Q If you can go back to Exhibit 9 real  
10 quick. And keep this one I'm looking at with you  
11 out too, but...

12 A Eight.

13 MR. COLLINS: One more. Getting warmer.

14 THE WITNESS: 10.

15 MR. COLLINS: Getting warmer.

16 THE WITNESS: 11. Sorry. Where is 9?

17 It has to be behind there. I'm sorry. 15. I  
18 don't see 9 here. Let me look at that other --

19 BY MR. BOGLE:

20 Q You can follow me up on the screen if  
21 you want. It doesn't matter to me.

22 MR. COLLINS: It's got to be in this  
23 stack.

24 THE WITNESS: If it's okay with you, I





[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

The image displays a horizontal bar chart with 20 rows. Each row begins with a small, dark gray square icon. Following the icon, there are one or more horizontal bars of varying lengths and positions. The bars are a medium gray color. The layout is as follows:

- Row 1: One long bar spanning most of the row.
- Row 2: One long bar spanning most of the row.
- Row 3: Two bars; the first is medium-length, and the second is short and positioned to the right.
- Row 4: Two bars; the first is medium-length, and the second is long and positioned to the right.
- Row 5: Two bars; the first is medium-length, and the second is long and positioned to the right.
- Row 6: One long bar spanning the entire row.
- Row 7: One medium-length bar.
- Row 8: One medium-length bar.
- Row 9: Three bars; the first is short, the second is medium-length, and the third is long and positioned to the right.
- Row 10: Two bars; the first is long, and the second is medium-length and positioned to the right.
- Row 11: One medium-length bar.
- Row 12: Two bars; the first is short, and the second is long and positioned to the right.
- Row 13: Two bars; the first is short, and the second is long and positioned to the right.
- Row 14: One long bar spanning most of the row.
- Row 15: One long bar spanning most of the row.
- Row 16: One long bar spanning the entire row.
- Row 17: One medium-length bar.
- Row 18: Two bars; the first is short, and the second is medium-length.
- Row 19: Two bars; the first is medium-length, and the second is long and positioned to the right.

20 MR. BOGLE: No further questions at this  
21 time.

22 MR. COLLINS: Why don't we take five  
23 minutes? I have some redirect.

24 THE VIDEOGRAPHER: The time is 4:59 p.m.

1 We're going off the record.

2 (Recess.)

3 THE VIDEOGRAPHER: The time is 5:12  
4 p.m., and we're back on the record.

5 REDIRECT EXAMINATION

6 BY MR. COLLINS:

7 Q Good afternoon, Mr. Snider.

8 A Good afternoon.

9 Q I'm Kevin Collins.

10 A Yes.

11 Q Where do you currently live?

12 A I currently live in -- south of  
13 Youngstown, Ohio -- Poland, Ohio.

14 Q Can you keep your voice up. I know it's  
15 been a long day. One more time?

16 A Poland, Ohio.

17 Q Okay. And what county is that?

18 A It's Mahoning County.

19 Q All right. And where is that county  
20 related to Summit and Cuyahoga counties?

21 A It's about three or four counties over  
22 east, directly east towards the PA line.

23 Q And how long have you resided there?

24 A Twenty -- 18 years.

1 Q All right. Where were you born and  
2 raised?

3 A I was born in Coshocton, Ohio, and was  
4 raised in Cuyahoga Falls in Summit County.

5 Q Where did you go to high school?

6 A Cuyahoga Falls High School.

7 Q What did you do after high school?

8 A I went to Kent State University.

9 Q And after Kent State, when did you  
10 graduate?

11 A I graduated in -- I'm sorry -- 1978.  
12 Sorry. That's a long time ago.

13 Q Okay. And when did you start working  
14 for McKesson?

15 A I believe '79, '80.

16 Q Can you briefly describe the positions  
17 you've held, starting from your earliest position  
18 at McKesson to your current position and where --  
19 where you were located.

20 A Okay. Sure. Started in North Canton,  
21 Ohio. I don't remember exactly how long, but I  
22 was first a trainee for a couple of months, and  
23 then a night supervisor after that couple of  
24 months of -- in there. And then I did that for

1 quite a few years, and then I got promoted to  
2 operations manager there, and I'm not sure what  
3 year that was. It would be on -- probably on my  
4 resume, but I don't remember.

5 And then after that, we built a new  
6 facility in Cincinnati, Ohio. Fairfield, Ohio, to  
7 be exact. And I ran -- I went there as the  
8 operations manager. And I --

9 Q What year was that?

10 A 1978. No, '75. I think so.

11 Q Would it be --

12 A No, no. No, no. I'm sorry. I have the  
13 wrong -- '95 or '6. Sorry about that.

14 Q I'm sorry. Where did you go after that?

15 A After Cincinnati, I went back to North  
16 Canton, and then they promoted me to distribution  
17 center manager over in Sewickley, Pennsylvania,  
18 and after that I was promoted to manager over  
19 Sewickley and North Canton. And we had closed  
20 Cincinnati, and then we closed North Canton, which  
21 was in Stark County, and we combined it into New  
22 Castle in 2000, and I was made the director of  
23 operations there.

24 Q So is it true that the New Castle

1 facility opened in 2000?

2 A Yes. May of 2000.

3 Q And when it opened, what was your title?

4 A I don't remember if it was DCM or DO,  
5 but it was one of those, and I ran the  
6 distribution center. We got -- started it up, and  
7 then I'm still there. So I've always been in the  
8 Ohio/PA market.

9 Q What geographic territory does the New  
10 Castle distribution service -- distribution center  
11 service?

12 A Our distribution center services -- if I  
13 could say what towns, you might know, but on the  
14 east is State College, which is the -- central PA;  
15 on the north is Erie, Pennsylvania, which is the  
16 north side; northwest is -- is Cleveland; and then  
17 southwest would be down to the Zanesville area;  
18 and then south would be -- I believe it was  
19 Morgantown, Weston; and then back up to New  
20 Castle. So we're in the geographic center.

21 Q How many employees do you manage?

22 A About 133 right now.

23 Q And how many employees are direct  
24 reports to you?



1           A       About ten.

2           Q       In your almost 19 years of managing the  
3   New Castle Distribution Center, how would you  
4   describe the performance of the distribution  
5   center?

6                   MR. BOGLE: Object to form, vague and  
7   ambiguous.

8                   THE WITNESS: The distribution center  
9   won the DC of the year seven times, and that's  
10   twice as many as any other distribution center has  
11   received that, and that's based on the quality and  
12   the performance of the distribution center.

13   BY MR. COLLINS:

14           Q       Are there ever any internal audits  
15   performed about the operations of the distribution  
16   center at New Castle?

17           A       Yes. We have four or five kinds of  
18   audits. The first kind is called a STARS audit  
19   that we do internally to match our SOPs to our  
20   performance. And that's done -- right now it's  
21   done by an accounting team. But before that, all  
22   those years, it was done by McKesson Regulatory  
23   Affairs folks.

24                   Then we have a specific --

1           Q     I'm sorry. Can you tell me how often  
2     that's done?

3           A     Every two, two-and-a-half years.

4           Q     Okay. And the next -- the other audit  
5     you were going to describe?

6           A     Yes. Sorry. The next audit is the DEA  
7     cyclic audit or any DEA unannounced audit. So  
8     we've had cyclic audits average two-and-a-half  
9     years. They try to do them every two years,  
10    but -- so I believe there were four audits at the  
11    distribution center by the DEA, and they've all  
12    came out as -- a hundred percent as exemplary. So  
13    that was one of the other audits.

14               And then monthly, we did the triannual  
15    report, which was a DEA SOPs. And then also we  
16    did a VAWD audit, which is the National Wholesale  
17    Association. We do that every two to five years  
18    depending on our licensure. We were one of the  
19    first DCs to get VAWD accreditation.

20               So when the DEA or we do our audits, we  
21    check our licensing and numerous other things, but  
22    the DEA has been in there a few times, and they've  
23    always had exemplary comments for New Castle and  
24    our team.

1 (Snider Exhibit No. 52 was marked  
2 for identification.)

3 BY MR. COLLINS:

4 Q I'm going to hand you what's been  
5 premarked as Exhibit 52.

6 Mr. Snider, can I ask you to identify  
7 what is Exhibit 52?

■ ■ [REDACTED]  
■ [REDACTED]  
■ ■ [REDACTED]  
■ ■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

16 Q Has the DEA ever complained to you about  
17 your operations at the New Castle Distribution  
18 Center?

19 MR. BOGLE: Object to form.

20 THE WITNESS: No. They've always  
21 said -- I know Kurt Dittmer, who was there before.  
22 Patty Robson is there right now as interim agent  
23 in charge, and before that we had -- I knew Jim  
24 Crawford, and all of them have given us exemplary

1 records.

2 BY MR. COLLINS:

3 Q Have you ever received -- or has the  
4 distribution center ever received any kind of  
5 minor infraction or citation from the DEA?

6 MR. BOGLE: Object to form.

7 THE WITNESS: Never.

8 BY MR. COLLINS:

9 Q In terms of the New Castle Distribution  
10 Center operations, on average, what's the volume  
11 of the pharmaceuticals that you distribute per  
12 day?

13 A We do about 150,000 pieces a day to  
14 200,000, depending on the day.

15 Q And when you say "pieces," what do you  
16 mean? Is that -- is that a tablet or --

17 A A bottle or pill, or even sometimes a  
18 case. It depends on the selling unit.

19 Q 150,000 pieces?

20 A Minimum.

21 Q And how many -- what portion of that is  
22 controlled substances?

23 A About fourteen to 15,000. Total for  
24 Class II, III, IV and V.

1           Q     And in terms of opioids, what's the  
2     percentage of the product that is moved out of the  
3     distribution center each day that is an opioid?

4           MR. BOGLE:   Object to form as to time,  
5     vague and ambiguous.

6           MR. COLLINS:   And I -- fair enough.   I  
7     will -- Mr. Bogle's objection is well founded.

8     BY MR. COLLINS:

9           Q     Over the course of the last 20 years,  
10    can you tell me how the volume of opioids, what  
11    it's been relative to the rest of the product  
12    that's been moved?

13          MR. BOGLE:   Object to form.

14          THE WITNESS:   Two percent.

15    BY MR. COLLINS:

16          Q     What other products besides controlled  
17    substances does the distribution center  
18    distribute?

19          A     We sell pharmaceuticals, legend drugs,  
20    over-the-counter merchandise, some medical  
21    devices, everything from syringes to -- we used to  
22    sell wheelchairs and that, but we got out of that  
23    business locally.   But we would sell anything you  
24    would see in a pharmacy.

1           Q     How significant in terms of the  
2     resources are controlled substance to your daily  
3     distribution needs?

4           MR. BOGLE:   Object to form.

5           THE WITNESS:   Currently we have about 10  
6     or 12 people that do nothing but the controls.   I  
7     have two clerks that do nothing but the paper 222  
8     forms or sorting those out, and I have one that  
9     answers the phone and balances those edits.   We  
10    send an edit every day to the DEA, electronically.  
11    I believe it's the Philadelphia office.

12   BY MR. COLLINS:

13           Q     Let's take an opioid that is received in  
14     your distribution center, and I'd like you to  
15     describe how it's received, how it's handled, how  
16     it's stored, and how it's then further  
17     distributed.

18           MR. BOGLE:   Objection.   Form, compound.

█                   ████████████████████   ██  
█   ████████   ██  
█   ██  
█   ██  
█                   ██  
█   ████████████████████   ██

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 BY MR. COLLINS:

17 Q I'm going to hand you a series of  
18 photographs and ask you to identify them for me.

19 A Okay.

20 Q They've been premarked as Exhibits 2  
21 through -- 2 through 11. So I'm going to hand you  
22 each of those, and I want you to tell me -- I'll  
23 hand them to you. You can have a seat.

24 I'm sorry, 53 through 62.

1 (Snider Exhibits No. 53 through 62  
2 were marked for identification.)

3 BY MR. COLLINS:

4 Q So I'm handing you 53. Do you recognize  
5 what's depicted in Exhibit 53?

6 A Yes.

7 Q What is it?

8 A This is our control substance cage for  
9 Class III, IV and V merchandise.

10 Q And where is that perspective from?

11 A It's from the mezzanine level looking  
12 down.

13 Q And does that fairly and accurately  
14 depict the cage --

15 A Yes.

16 Q -- in its current state?

17 A Yeah, the bottom right is our  
18 self-closing door. And then I'll -- which has a  
19 scanner on it so we know only people can enter  
20 that are accessed to that. And there's quite a  
21 bit of -- well, you don't see the security here,  
22 but there's quite a bit there.

23 Q Let me hand you what's been premarked as  
24 Exhibit 54. Can you identify what's depicted in





1 premarked as Exhibit 55. Describe what -- tell me  
2 if you identify -- can identify what's in that  
3 picture.

Age Group	Percentage
18-24	10%
25-34	90%
35-44	98%
45-54	100%
55-64	15%
65-74	55%
75-84	40%
85+	20%

11 Q Let me show you what's been -- I'm going  
12 to -- actually, does that fairly and accurately  
13 depict the area that you just described?

14                    A            Yes.

15 Q I'm going to hand you what's been  
16 premarked as Exhibit 56.

17           A       Thank you.

18 Q Do you recognize what's depicted in  
19 Exhibit 56?

20           A       Yes, I do.

21 Q What is it?

Category	Percentage
Very important	45%
Important	35%
Not important	15%
Don't know	5%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8           Q     You -- you indicated this -- well, does  
9     this fairly and accurately depict the area you  
10    just described?

11           A     Yes.

12           Q     You indicated this is relatively recent.  
13    What did you have there before?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

█ [REDACTED]

2           Q     Let me show you what's been premarked as  
3     Exhibit 57, and ask you to tell me whether you can  
4     identify that.

█        █     [REDACTED]

█     [REDACTED]

█     [REDACTED]   [REDACTED]

█     [REDACTED]

█     [REDACTED]

10           Q     Does it fairly and accurately depict  
11     that area you just described?

12           A     Yes.

13           Q     I want to show you -- hand you what's  
14     been premarked as Exhibit 58. Ask you to identify  
15     or tell me whether you can identify that.

█        █     [REDACTED]

█     [REDACTED]   [REDACTED]

█     [REDACTED]

█     [REDACTED]

█        █     [REDACTED]

█     [REDACTED]

█        █     [REDACTED]

█        █     [REDACTED]

█        █     [REDACTED]

█        █     [REDACTED]

[REDACTED]

[REDACTED]

3 Q And when you say '13 or '14, 2013 and  
4 2014?

5 A Yes.

6 Q And who has access to this area?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q Let me show you what's been premarked as  
8 Exhibit 59. Can you identify what's in Exhibit 59  
9 for me?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 Q Does this fairly and accurately depict  
18 the area you just described along with these  
19 cages?

20 A Yes.

21 Q I show you what's been premarked as  
22 Exhibit 60. Ask you to identify what's depicted  
23 there, if you can.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 Q And does it fairly and accurately depict  
15 the area you just described?

16 A Yes, it does.

17 Q I'm showing you what's been premarked as  
18 Exhibit 61. Please tell me whether you can  
19 identify this area for me.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12           Q     And I don't recall if I already asked  
13     you, but does this fairly and accurately depict  
14     the area you just described?

15           A     Yes.

16           Q     I'm showing you what's been premarked as  
17     Exhibit 62. Ask you to identify what's depicted  
18     in Exhibit 62.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 Q Other than that one occasion I think you  
10 said in 2010 where you had an employee that was  
11 involved in some theft, have you ever had any  
12 other type of incident at your distribution  
13 center?

14 A Yes, we had -- up in Cleveland, someone  
15 approached one of the drivers with a gun, and he  
16 actually yelled for them to get out, and they  
17 actually did. But they asked him to open the back  
18 of his truck, which is always locked, and produce  
19 the totes. And he actually used to run a  
20 Mini-Mart is how he did that.

21 And I know that because our delivery  
22 service has worked for me for almost 40 years, and  
23 it's a dedicated delivery service, and no other  
24 wholesaler has that. And these guys carry

1     scanners so they can scan the totes. We know when  
2     they bring them back how many totes were  
3     delivered. They call if there's an error, they  
4     had ten instead of nine. So we investigate that,  
5     et cetera. But the drivers have been dedicated  
6     service only for McKesson totes, which I think is  
7     a differentiator for us.

8             Q     Do you see any totes in this Exhibit --  
9     is it 62?

[REDACTED]

16            Q     And does this fairly and accurately  
17     depict the -- sort of the various views of the  
18     cameras?

19            A     Yes.

[REDACTED]





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q Does the distribution center communicate  
11 with local DEA?

12 A Yes.

13 Q How often?

14 A Not as much right now, but they will  
15 call me. I talked to Patty Robson last week. And  
16 I also used to talk to Kurt Dittmer quite a bit  
17 before he retired. And I've known these folks for  
18 a long time, and I would probably say at least  
19 twice a month there was some contact.

20 Q Has the DEA -- the local DEA ever given  
21 you a complaint about the operation of the  
22 distribution center?

23 MR. BOGLE: Object to form.

24 THE WITNESS: They've never.

1 BY MR. COLLINS:

2 Q I'm sorry?

3 A No, they have never.

4 Q In earlier questioning by Mr. Bogle, he  
5 mentioned a settlement agreement with the -- the  
6 Justice Department. Do you recall that?

7 A Yes.

8 Q Do you know if the New Castle  
9 Distribution Center was mentioned in that  
10 settlement agreement?

11 A I know it was not.

12 (Snider Exhibit No. 64 was marked  
13 for identification.)

14 BY MR. COLLINS:

15 Q I'm going to show you what's been  
16 premarked as Exhibit 64.

17 Do you recognize that document?

18 A Yes.

19 Q What is it?

20 A It's the controlled substance compliance  
21 process.

22 Q And what's the purpose of this document?

■ ■ [REDACTED]

■ [REDACTED]

[illegible]

[illegible]





1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		
32		
33		
34		
35		
36		
37		
38		
39		
40		
41		
42		
43		
44		
45		
46		
47		
48		
49		
50		
51		
52		
53		
54		
55		
56		
57		
58		
59		
60		
61		
62		
63		
64		
65		
66		
67		
68		
69		
70		
71		
72		
73		
74		
75		
76		
77		
78		
79		
80		
81		
82		
83		
84		
85		
86		
87		
88		
89		
90		
91		
92		
93		
94		
95		
96		
97		
98		
99		
100		

[illegible]

1           Q     When the New Castle Distribution Center  
2     first became operational in 2000, did you have  
3     access to customer information in terms of who  
4     else was supplying them?

5           A     No, I didn't.

6                     MR. BOGLE: Object to form.

7     BY MR. COLLINS:

8           Q     Do you have that now?

9           A     The DRAs have all the access to that,  
10    yes.

11          Q     And when did that start?

12          A     I'm -- I'm not sure if that was 2008,  
13    but -- with the Lifestyle drugs, but I know that  
14    the fact that they could see the wholesalers'  
15    information, I think Izzy told me it was just  
16    within the last few years.

17                     (Snider Exhibit No. 66 was marked  
18                     for identification.)

19    BY MR. COLLINS:

20          Q     I'm going to show you what's been now  
21    premarked as Exhibit 66, and ask you to identify  
22    it for me.

23                     What is Exhibit 66?

- **Strategic Planning**
- **Operational Planning**
- **Financial Planning**
- **Human Resource Planning**
- **Marketing Planning**
- **Production Planning**
- **Inventory Planning**
- **Transportation Planning**
- **Facility Planning**
- **Information Systems Planning**
- **Research and Development Planning**
- **Legal and Compliance Planning**
- **Environmental Planning**
- **Health and Safety Planning**
- **Quality Management Planning**
- **Customer Relationship Management Planning**
- **Supply Chain Management Planning**
- **Project Management Planning**
- **Risk Management Planning**
- **Business Continuity Planning**
- **Information Security Planning**
- **Employee Training and Development Planning**
- **Performance Management Planning**
- **Compensation and Benefits Planning**
- **Recruitment and Selection Planning**
- **Employee Engagement Planning**
- **Organizational Development Planning**
- **Change Management Planning**
- **Leadership Development Planning**
- **Succession Planning**
- **Board of Directors Planning**
- **Shareholder Relations Planning**
- **Public Relations Planning**
- **Media Relations Planning**
- **Community Relations Planning**
- **Government Relations Planning**
- **Industry Relations Planning**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12           Q     You've mentioned the director of  
13     Regulatory Affairs a number of times.  What's his  
14     or her role?

15                     MR. BOGLE:  Object to form.

16                     THE WITNESS:  They're vetting out the  
17     regulations and the customers that we either  
18     onboard or sell to.

19     BY MR. COLLINS:

20           Q     Given your almost four decades of  
21     experience with McKesson, including almost 20  
22     years as the director of operations of the New  
23     Castle Distribution Center, what do you think  
24     about all of these allegations about McKesson

1 fueling the opioid crisis?

2 MR. BOGLE: Object to form.

3 THE WITNESS: I spent most of my life in

4 Summit County. I know Cuyahoga County. I'm

5 probably the last Browns' fan you'll ever meet.

6 So it means a lot to me, and I would never do

7 anything willingly to create an opiate crisis.

8 I -- I feel it is terrible and I feel bad for it,

9 but I don't say that I caused it at -- at New

10 Castle.

11 BY MR. COLLINS:

12 Q Besides your handling of distribution of

13 pharmaceuticals in a routine way, are you aware of

14 any other things that you've done as a head of

15 operations at the distribution center --

16 MR. BOGLE: Object.

17 BY MR. COLLINS:

18 Q -- that would impact the community?

19 MR. BOGLE: Object to form.

20 THE WITNESS: Yeah, I guess that's where

21 I say about some of the things we do.

22 I know in -- I think it was Summit

23 County, Stark County, there was a meningitis

24 outbreak several years ago, and one of the high

1 school kids, one or two of them died, and so we  
2 had to provide the antidote or the medicine for  
3 that. And I called in helicopters, and they  
4 landed in the parking lot and they distributed to  
5 the County Board of Health, I believe it was, and  
6 one of the hospitals. And that's kind of what we  
7 do.

8 I also -- just recently one of my  
9 managers from UPMC Pittsburgh Hospital, they had a  
10 snake bite, and they must have been in central PA.  
11 I'm not sure how that happened. But we -- he  
12 didn't know if the courier could get there quick  
13 enough, so he grabbed it and drove it down  
14 himself, and that saved the kid.

15 And then we were in McKesson Today for  
16 New Castle recently for the Washington Courthouse  
17 distribution center in Ohio that we provided and  
18 had a life-saving medicine, and my manager drove  
19 it halfway, they had someone pick it up, and it  
20 saved the patient. It was a mother who was  
21 pregnant and needed this medicine to save the  
22 baby, and I know that's what we did.

23 It was written up in the McKesson Today,  
24 et cetera, and Bev did most of the work. I just



1 was standing there. But that's the kind of thing  
2 we do that I wanted to make sure I got on the  
3 record.

4 MR. COLLINS: I have no further  
5 questions. You want to switch?

6 MR. BOGLE: Yeah, just give me a couple  
7 of minutes.

8 THE VIDEOGRAPHER: The time is 5:55 p.m.  
9 We're going off the record.

10 (Recess.)

11 THE VIDEOGRAPHER: The time is 6:02  
12 p.m., and we're back on the record.

13 RE CROSS-EXAMINATION

14 BY MR. BOGLE:

15 Q All right. Mr. Snider, I have a few  
16 follow-up questions for you.

17 You made reference to opioids being  
18 2 percent of the overall volume at your  
19 distribution center. Do you recall that  
20 testimony?

21 A Yes. At one time, yes.

22 Q Yeah, that number has not been stagnant,  
23 right? For example, when you started in 2000,  
24 that number increased over time, didn't it?

1 MR. COLLINS: Objection. Vague.

2 THE WITNESS: Over time, yes, it did.

3 BY MR. BOGLE:

4 Q Right. So when you say that opioids  
5 were 2 percent of the total volume at New Castle,  
6 you're not representing to our jury that that was  
7 true for the entire period of 2008 -- or 2000 to  
8 present, right?

9 A No. I just got the data from present.

10 Q From today?

11 A Recently.

12 Q Right. So, for example, you have the  
13 2018 data is what you're talking about.

14 A Yes.

15 Q Okay. And it was higher than that, for  
16 example, in 2010.

17 A I don't -- I don't know that, what it  
18 was.

19 Q You don't know. So you didn't check  
20 anything other than 2018.

21 A Correct.

22 Q Okay. You provided some -- some  
23 testimony about -- to the effect that the DEA has  
24 never had any complaints about any activities

1 involving New Castle. Is that right?

2 A Yes.

3 Q Okay. Have you reviewed any of the DEA  
4 and DOJ letters that led to the -- the \$150  
5 million settlement agreement?

6 A I looked at them, yes, briefly.

7 Q Did you just look at the settlement  
8 agreement, or did you look at any of the internal  
9 letters that led up to that?

10 A I looked at the distribution centers  
11 listed.

12 Q Okay. Did you review the letters in  
13 detail beyond that?

14 A No.

15 Q Okay. So, for example, if the -- some  
16 of the letters from the DEA indicate that they  
17 found nationwide and systemic violations regarding  
18 controlled substance monitoring at McKesson,  
19 that's something you were not aware of when you  
20 provided that testimony, right?

21 MR. COLLINS: Objection. Assumes facts  
22 not in evidence. Lack of foundation.

23 BY MR. BOGLE:

24 Q Right?

1           A       Can you ask me -- I'm not sure what you  
2   mean by --

3           Q       Sure.

4           A       -- "provided that testimony."

5           Q       You provided testimony there's been no  
6   complaints about -- about New Castle from the DEA.

7           A       Yes.

8           Q       And my question to you was, did you  
9   review any of these letters from the DEA to assess  
10   whether they made any comments about the fact that  
11   they found nationwide and systemic violations as  
12   to McKesson's suspicious order monitoring  
13   programs?

14                   MR. COLLINS: Object to form.

15                   THE WITNESS: I did not discuss it with  
16   the DEA.

17   BY MR. BOGLE:

18           Q       No, I'm talking about in the letters.  
19   Did you see that in the letters anywhere?

20                   MR. COLLINS: Objection. I'm not  
21   sure --

22   BY MR. BOGLE:

23           Q       All right. Let's just take a look at  
24   one.

1           A           No, I didn't.

2 Q Okay. Let's take a look at one.

3           A       I thought you said did I review it with  
4   the DEA.  That's what I heard.

5 Q All right. That's fine.

6 (Snider Exhibit No. 67 was marked  
7 for identification.)

8 BY MR. BOGLE:

9           Q       Exhibit 67, I'm going to hand you here,  
10   also marked as 1.1443.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Response	Percentage
Yes	87%
No	10%
Don't know	3%

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Age Group	Percentage
18-24	10%
25-34	25%
35-44	30%
45-54	20%
55-64	10%
65-74	5%
75-84	5%
85+	5%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q Okay. When you looked through the DEA  
11 correspondence prior to testifying today, do you  
12 recall reading that statement?

13 MR. COLLINS: Objection. Lack of  
14 foundation. Form.

15 THE WITNESS: No, I don't.

16 BY MR. BOGLE:

17 Q You don't. Okay.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q Okay. Do you recall seeing that in the  
8 letter that you reviewed?

9 MR. COLLINS: Objection. Asked and  
10 answered.

11 THE WITNESS: No.

12 BY MR. BOGLE:

13 Q You reviewed quite a few photos of the  
14 New Castle Distribution Center. Do you recall  
15 that?

16 A Yes.

17 Q Okay. Now, those photos all pertain to  
18 security measures contained within your facility  
19 at New Castle, right?

20 A Yes.

21 Q Okay. None of those photos pertain to  
22 anything that involved trying to make sure that  
23 the controlled substances once they are sold get  
24 into the right hands, right?

[REDACTED]

18           Q     You talked too about these -- these  
19     totes that the controlled substances are carried  
20     in. Do you recall discussing that generally?

21           A     Yes.

22           Q     And I think you said something about  
23     having dedicated drivers delivering these totes,  
24     and that was something that you thought



1 differentiated McKesson from other wholesalers.

2 Am I summarizing that fairly?

3 A Yes.

4 Q Okay. Now, you've had at New Castle  
5 problems with lost totes that carried controlled  
6 substances in them, right?

7 MR. COLLINS: Objection. Form.

8 THE WITNESS: No.

9 BY MR. BOGLE:

10 Q You've never lost a tote?

11 A I didn't say that. We don't have a  
12 problem with it.

13 Q Okay. Well, we talked about Giant  
14 Eagle, for example, earlier, right, and you recall  
15 back in 2014 losing several totes that included  
16 controlled substances for deliveries to Giant  
17 Eagle, right?

18 A No, I don't.

19 Q You don't?

20 A Nope.

21 Q Okay. All right.

22 (Snider Exhibit No. 68 was marked  
23 for identification.)

24 BY MR. BOGLE:



[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 Q That contained controlled substances.

16 A If you give me time to read it, I will.

17 I'm not -- it's HBC --

18 Q Sure. It's a one-page e-mail. Go  
19 ahead.

20 A Sorry, there's other pages here. Okay.  
21 (Peruses document.)

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]



1           Q     Right. But it's -- it's certainly these  
2     delivery drivers -- either delivery drivers or HBC  
3     that lost these totes. We can agree on that,  
4     right?

5           A     Yes.

6           Q     Okay.

7           A     Also there's no manifest to show that.  
8     So the -- I'm sure that Greg Carlson and the Giant  
9     Eagle folks reported that to the DEA, that they  
10    have missing totes, or I don't even know that they  
11    found them at another store or where --

12          Q     Right. You don't know either way,  
13    right?

14          A     No.

15          Q     But you do agree with me this discusses  
16    missing totes?

17                   MR. COLLINS: Objection. The question  
18    is vague.

19    BY MR. BOGLE:

20          Q     Right?

21          A     Yeah.

22                   MR. COLLINS: The question is vague.

23    BY MR. BOGLE:

24          Q     Now, you talked about McKesson always



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 Q Okay. Now, you said that there were  
14 reports sent to the DEA, unusual order reports, I  
15 think you called them, from 2000 to 2006. Do you  
16 recall that?

17 A Yes.

18 Q Do you have any documentary proof of  
19 that at this point in time?

20 A No.

21 Q And you also said that at some point in  
22 time, the D -- a DEA agent told you on the phone  
23 that he didn't want daily unusual reports anymore.  
24 Do you recall that?

1           A       Yes.

2           Q       Do you have any documentary proof of  
3   that today?

4           A       I don't have the e-mail.  He actually  
5   put it in writing for me.

6           Q       But you don't have that, right?

7           A       No, not from two -- whatever year that  
8   was.

9           Q       So we don't have any way to verify by  
10   documentation either of those statements, do we?

11                   MR. COLLINS:  Objection.  It's a  
12   mischaracterization.  You can ask the DEA.

13                   THE WITNESS:  From Kurt Dittmer would be  
14   the only way to verify that.

15   BY MR. BOGLE:

16           Q       We don't have any documentary evidence  
17   that you can provide us as to providing reports  
18   from 2000 to 2006, number one, right?

19           A       Number one?

20           Q       First thing.  You can't point me to any  
21   documents that show that you actually did what you  
22   said you did?

23           A       No, I don't have those e-mails from 2004  
24   or whatever year it was.



1           Q     And you don't -- and you don't have any  
2     e-mail that you can show me or to the jury or to  
3     anybody else about the DEA agent specifically  
4     calling you and telling you that you didn't need  
5     to provide daily reports anymore, correct?

6           A     I don't have that.

7           Q     You were asked about obtaining data from  
8     other -- strike that.

9                     You talked about being able to obtain  
10    data regarding your customers receiving controlled  
11    substances from other manufacture -- other --  
12    other wholesalers. Do you recall that?

13          A     Yes.

14          Q     And you talked about when you thought  
15    that was available, and I won't go back into the  
16    exact years, but you recall talking about a  
17    timeline --

18          A     Yes.

19          Q     -- when you thought that was available,  
20    right?

21          A     Yes.

22          Q     The bottom line is, McKesson at all  
23    times was able to ask the customer for that data,  
24    right?

1 MR. COLLINS: Objection. Compound,  
2 argumentative.

3 THE WITNESS: I don't know that.

4 BY MR. BOGLE:

5 Q You don't know whether McKesson at all  
6 times could ask their own customers, Listen, give  
7 me all of the drugs that you're getting from all  
8 the wholesalers, give me proof of that, I want to  
9 see?

10 A From 2000 on, I don't know that -- if  
11 that was legally feasible.

12 Q Legally feasible?

13 A Yeah, I don't know --

14 Q You've asked --

15 A -- if we could legally give them the  
16 other wholesalers' information.

17 Q Do you recall anybody ever asking, that  
18 you were aware of?

19 MR. COLLINS: Objection to form.

20 THE WITNESS: Yes.

21 BY MR. BOGLE:

22 Q You recall somebody asking for it?

23 A Yes.

24 Q And somebody saying that was legally not

1 possible?

2 A No.

3 Q Okay. So -- but what you do know is you  
4 guys can get it today, right?

5 A I -- yes, as he showed me.

6 Q Any -- are you aware of any changes to  
7 the laws that would allow it today that didn't  
8 exist before?

9 MR. COLLINS: Objection. Calls for a  
10 legal conclusion, among other things.

11 THE WITNESS: I don't know anything  
12 about the laws, no, right now on that.

13 BY MR. BOGLE:

14 Q Okay. Well, you talked about the fact  
15 that you guys could get it. I'm just trying to  
16 follow up on that.

17 A It depends --

18 MR. COLLINS: I'm sorry, is that -- I'm  
19 not sure that's a question.

20 MR. BOGLE: No, it's not. It's just a  
21 comment.

22 BY MR. BOGLE:

23 Q Now, you talked about blocked orders and  
24 suspicious order reports generally. Do you recall





[illegible]

[REDACTED]

15 MR. COLLINS: Objection. Lack of  
16 foundation what this --

17 BY MR. BOGLE:

18 Q So you don't know what this report is  
19 even about?

20 MR. COLLINS: I'm sorry, let me finish  
21 my objection. Lack of foundation. You haven't  
22 established this witness's knowledge as to what  
23 this document --

24 BY MR. BOGLE:

1           Q     Geez, it should, man. I mean, you don't  
2     know when orders were blocked from your  
3     distribution center?

4           MR. COLLINS: You don't have to answer  
5     that.

6     BY MR. BOGLE:

7           Q     No, you do. You don't know that?

8           MR. COLLINS: Actually -- actually, lack  
9     of foundation. You haven't established this  
10    witness has any knowledge about this document. He  
11    keeps telling you he doesn't know anything about  
12    the document, and you keep asking him questions  
13    about a document he doesn't know anything about.

14          THE WITNESS: I don't know anything  
15    about this document, and you say it's a blocked  
16    item document, and this cover page is on it, but  
17    I've never seen this before.

18    BY MR. BOGLE:

19          Q     I put the cover page on there.  
20    Everything else --

21          A     Oh --

22          Q     -- is provided to us by --

23          A     -- I did not know that.

24          Q     That's a summary of the data included in



1     there.

2           A       If you say so, but I don't -- can't  
3     testify to that.

4           Q       Okay. You have no reason to dispute the  
5     accuracy of either of those statements, do you, on  
6     the first page?

7                   MR. COLLINS: Objection. Lack of  
8     foundation.

9     BY MR. BOGLE:

10          Q       Do you?

11                   MR. COLLINS: Objection. Lack of  
12     foundation.

13                   THE WITNESS: I don't trust what you put  
14     on here.

15     BY MR. BOGLE:

16          Q       You don't trust what I put on there?

17          A       No.

18          Q       Show me where I'm wrong in the document.

19          A       I don't know the document.

20          Q       Okay. You don't have any idea, right?

21                   MR. COLLINS: Objection. Argumentative.

22                   MR. BOGLE: No further questions.

23                   MR. COLLINS: Actually I have a couple  
24     of follow-ups.



1 have been their manifest.

2 But Barb is trying to find out because  
3 she's doing due diligence to make sure controls  
4 don't get out on the street.

5 BY MR. BOGLE:

6 Q Does this document reflect that McKesson  
7 lost totes?

8 A No.

9 MR. BOGLE: Object to form.

10 MR. COLLINS: No further questions.

11 MR. BOGLE: All right, we're done.

12 THE VIDEOGRAPHER: All right. The time  
13 is -- sorry, anything else?

14 MR. BOGLE: No, I'm good.

15 MR. COLLINS: We're good.

16 THE VIDEOGRAPHER: Anybody on the phone  
17 either?

18 I just want to make sure --

19 MR. COLLINS: I didn't even know -- was  
20 there anybody participating by phone?

21 THE VIDEOGRAPHER: The time is  
22 6:23 p.m., November 8, 2018.

23 Going off the record, completing the  
24 videotaped deposition.

1                   (Whereupon, the deposition of  
2                   BLAINE M. SNIDER was concluded  
3                   at 6:23 p.m.)  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 The undersigned Certified Shorthand Reporter  
3 does hereby certify:

4 That the foregoing proceeding was taken before  
5 me at the time and place therein set forth, at  
6 which time the witness was duly sworn; That the  
7 testimony of the witness and all objections made  
8 at the time of the examination were recorded  
9 stenographically by me and were thereafter  
10 transcribed, said transcript being a true and  
11 correct copy of my shorthand notes thereof; That  
12 the dismantling of the original transcript will  
13 void the reporter's certificate.

14 In witness thereof, I have subscribed my name  
15 this date: November 13, 2018.

16

17

18 \_\_\_\_\_  
LESLIE A. TODD, CSR, RPR

19 Certificate No. 5129

20 (The foregoing certification of  
21 this transcript does not apply to any  
22 reproduction of the same by any means,  
23 unless under the direct control and/or  
24 supervision of the certifying reporter.)

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition. It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

1	-	-	-	-	-	-
2	E	R	R	A	T	A
3	-	-	-	-	-	-

4 PAGE LINE CHANGE

5 \_\_\_\_\_

6 REASON: \_\_\_\_\_

7 \_\_\_\_\_

8 REASON: \_\_\_\_\_

9 \_\_\_\_\_

10 REASON: \_\_\_\_\_

---

11

12 REASON: \_\_\_\_\_

13 \_\_\_\_\_

14 REASON: \_\_\_\_\_

15 \_\_\_\_\_

16 REASON: \_\_\_\_\_

18 REASON: \_\_\_\_\_

20 REASON: \_\_\_\_\_

22 REASON: \_\_\_\_\_

24 REASON: \_\_\_\_\_

ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do hereby  
certify that I have read the foregoing pages, and  
that the same is a correct transcription of the  
answers given by me to the questions therein  
propounded, except for the corrections or changes  
in form or substance, if any, noted in the  
attached Errata Sheet.

\_\_\_\_\_  
BLAINE M. SNIDER

DATE

Subscribed and sworn to

before me this

\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public